

**STRUCTURAL STABILITY AND FACTOR OF SAFETY ASSESSMENT
EAST AND WEST ASH BASINS
WAUKEGAN STATION
OCTOBER 2016**

This report presents the initial periodic structural stability and initial safety factor assessment of the East and West Ash Basins (the Basins) at the Waukegan Station (Site) in Waukegan, Illinois (Figure 1). This report addresses the initial structural stability and safety factor assessment requirements of the Coal Combustion Residuals (CCR) regulations, Code of Federal Regulations Title 40, Part 257, Subpart D (referred to as the CCR Rule). These regulations were published in the Federal Register on 17 April 2015 and became effective on 19 October 2015. The Waukegan Station is owned and operated by Midwest Generation, LLC (Midwest Generation). Based on the results provided in this report, the East and West Ash Ponds meet the requirements of §257.73(d) and §257.73(e) of the CCR Rule.

The work presented in this report was performed under the direction of Ms. Jane Soule, P.E., of Geosyntec Consultants Inc. (Geosyntec) in accordance with §257.73(d) and §257.73(e). Mr. Robert White reviewed this report in accordance with Geosyntec's senior review policy.

1. Regulation Requirements - §257.73

Structural integrity criteria for existing CCR impoundments is described in §257.73 and includes structural stability and factor of safety assessments. The East and West Ash Basins meet the minimum size and capacity criteria under §257.73(b) and are subject to the structural stability and safety factor assessments required.

2. Site Conditions

The Basins are co-located in the southeastern portion of the Waukegan Station. A divider berm extends north-south between the Basins. The Basins are irregular in shape, and each includes a finger berm extending from the northern boundary southward approximately 715 feet. The West Ash Basin is approximately 470 feet by 975 feet in plan dimensions with a total plan area of approximately 11.0 acres (including the finger berm and embankment crests). The East Ash Basin is approximately 470 feet by 1,030 feet in plan dimensions with a total plan area of approximately 11.8 acres (including the finger berm and embankment crests).

A retaining wall is located on the downstream side of the north embankment, north of the outlet structures for the Basins.

Based on available documentation and discussions with site personnel, the Basins, in their current configuration, were constructed in the late 1970s. A history of construction for the Basins

was prepared in accordance with §257.73(c) and describes the design of the Basins and their construction (Geosyntec, 2016a).

3. Structural Stability Assessment

The following subsections address the components of §257.73(d)(1).

3.1 Foundations and Abutments – §257.73(d)(1)(i)

The East and West Ash Basins consist of fill embankments on all sides. The area west of the West Ash Basin includes fill graded to approximately the same elevation as the west embankment crest. Because no formational material provides lateral structural support for the embankments, there are no abutments associated with the Basins. The remainder of this section addresses the foundation materials for the East and West Ash Basins.

Previous subsurface investigations performed at the Site indicate the foundation materials underlying the embankments for the East and West Ash Basins generally consist of approximately 30 feet of dense, poorly graded sand with some gravel, and silt and silty sand associated with the Henry Formation (Geosyntec, 2016b). Due to the granular nature of the foundation soils (mostly sand and gravel), settlement associated with the construction and operation of the Basins is anticipated to be predominately elastic settlement, which would likely have occurred soon after construction in the late 1970s. Because of the age of the embankments (over 35 years old), the majority of potential consolidation and secondary compression settlement has likely already occurred. Further, the embankments of the Basins were not constructed with abutments or separate engineered zones that would be most susceptible to the adverse effects of differential settlement.

During the initial annual inspection performed for the Basins in accordance with §257.83(b), no visual evidence of adverse effects resulting from settlement was observed (Geosyntec, 2016c). There are no proposed changes in operation which would increase loading conditions on the foundation; therefore, no significant settlement of the foundation materials underlying the embankments is anticipated to occur in the future and the settlement of the foundation is not anticipated to impact the integrity of the impoundment embankments.

A factor of safety against the triggering of liquefaction was calculated for saturated foundation materials underlying the Basins' embankments. The factor of safety was calculated based methods outlined in Idriss and Boulanger (2008) using information obtained from field explorations, including borings, Cone Penetration Test (CPT) soundings, laboratory data (Geosyntec, 2016b), and seismic data (Geosyntec, 2016d). The liquefaction triggering analyses shows a very low likelihood of liquefaction occurring in the foundation materials underlying the embankments (Geosyntec, 2016d).

3.2 Upstream Slope Protection – §257.73(d)(1)(ii)

The West and East Basins are lined with a 60-mil high density polyethylene (HDPE) geomembrane that protects the interior basin slopes from erosion, the effects of wave action, and mitigates potential effects of rapid drawdown.

3.3 Dike Compaction – §257.73(d)(1)(iii)

Documentation of as-built construction conditions for the East and West Ash Basin embankments was not available at the time of this report. However, available construction drawings from 1977 indicated that embankment fill was to be compacted to a minimum of 95 percent relative compaction as determined by Modified Proctor testing. No recent quantitative evaluation of the degree of compaction of the embankments was performed on the embankments in their current state; however, slope stability analyses shows the embankments for the East and West Ash Basins are sufficient to withstand the range of loading conditions in the CCR units (Geosyntec, 2016e).

3.4 Downstream Slope Vegetation – §257.73(d)(1)(iv)

The northern and southern downstream slopes of the West and East Ash Basins are covered with established vegetation. The eastern downstream slope of the East Ash Basin has been recently covered in erosion control matting and seeded. Based on site observations, the existing surface conditions of the slopes provide adequate slope protection.

3.5 Spillway – §257.73(d)(1)(v)

The West and East Basins were designed and constructed, and are operated and maintained, without spillways. Inflows for the Basins consist solely of regulated flows from plant operations and precipitation that falls within the surface area of the Basins and embankment crests. There is no significant run-on to the Basins. Subsequently, surface water levels are maintained by regulating inflow from plant operations, regulating outflow quantities, and monitoring and maintaining freeboard to accommodate precipitation from the design storm event. An inflow design flood control system plan has been prepared to document that the Basins adequately manage flow from the design event (Geosyntec, 2016f).

3.6 Structural Integrity of Hydraulic Structures – §257.73(d)(1)(vi)

Hydraulic structures passing through or beneath the embankments of the East and West Ash Basins consist of six pipes and conveyance structures associated with the inlet and outlet structures of the Basins. These structures and pipes were inspected between 1 June 2016 and 7 June 2016 by a company specializing in video camera pipe inspections. Inspections consisted

only of the length of the pipe or structure that passes through or beneath the Basins' embankments. The inspected structures and pipes related to the East and West Ash Basins are presented on Figure 2.

The video inspections showed no significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, or debris that would negatively affect the operation of Pipes 1, 2, 3, and 5. The video inspections identified isolated areas of deformation and deterioration of Pipes 4E and 4W, which are 24-inch diameter concrete pipes with invert locations at the bottom of the outlet structures for the East and West Ash Basins, respectively. These pipes are located under the north embankment and are utilized for dewatering the outlet structure. Repairs were made to Pipe 4E to mitigate the isolated areas of deformation and deterioration identified during the inspection. The valve for controlling flow into Pipe 4W has been closed by Site personnel, and Pipe 4W will not be used until a repair is completed. Pipe 4W is not required for normal operation of the West Ash Basin.

3.7 Downstream Slopes Adjacent to Water Bodies – §257.73(d)(1)(vii)

Water bodies near the East and West Ash Basins include a drainage channel located south of the Basins and marsh area east of the Basins. Stability analyses presented in Section 3 demonstrate structural stability with the water body at a “low pool” condition where there is little or no stabilizing force present on the downstream slope of the embankments.

Significant inundation of the downstream slopes of the East and West Ash Basins from the water body is unlikely, and the generally coarse-grained embankment fill materials that are relatively free-draining make a rapid drawdown analysis not applicable. Therefore, a rapid drawdown condition is not anticipated to impact structural stability of the impoundment embankments.

3.8 Structural Stability Assessment Deficiencies - §257.73(d)(2)

A structural stability deficiency associated Pipe 4W was identified in this initial structural stability assessment. Geosyntec suggests relining the interior of the deficient portions of the pipe as a corrective action. The pipe will remain out of service until the repair is complete. Documentation detailing the corrective measures taken to repair the pipe will be prepared after the repair is complete.

3.9 Annual Inspection Requirement - §257.83(b)(4)(ii)

In accordance with §257.83(b)(4)(ii), submittal of this structural stability assessment precludes the requirement of an annual inspection under §257.83(b) for the East and West Ash Basins during the 2016 calendar year. Deficiencies identified in the initial annual inspection for the East

and West Ash Basins were corrected as documented in the Notice of Remedy prepared in response to the initial annual inspection.

4. Safety Factor Assessment

This section describes the initial safety factor assessment for the East and West Ash Basins and the methodology used to perform the assessment in accordance with §257.73(e)(1). This assessment includes slope stability analyses of the critical embankment cross-sections for each basin, shown in Figure 3, and evaluation of stability of the retaining wall north of the Basins.

4.1 Slope Stability Methodology

Limit equilibrium slope stability analyses were performed to evaluate the stability of the embankments for the East and West Ash Basins. The process involved performing two-dimensional analyses on the critical cross-sections for each basin using Spencer's Method as coded in the computer program SLOPE/W (Version 8.15.4.11512, www.geoslope.com) which satisfies vertical and horizontal force equilibrium and moment equilibrium (Geosyntec, 2016e). For each cross section analyzed, the program searches for the sliding surface that produces the lowest factor of safety (FS). Factor of safety is defined as the ratio of the shear forces/moments resisting movement along a sliding surface to the forces/moments driving the instability.

Subsurface stratigraphy, groundwater conditions, and engineering parameters for the embankment and foundation materials were developed based on previous subsurface investigations performed at the Site (Geosyntec, 2016b and Geosyntec, 2016e).

4.2 Slope Stability Analyses

As presented in Table 1, four cases were analyzed to satisfy the safety factor assessment requirements in §257.73(e) (Geosyntec, 2016e).

4.2.1 Static, Long-Term Maximum Storage Pool Loading – §257.73(e)(1)(i)

Pursuant to §257.73(e)(1)(i) a static, long-term condition with the maximum operating pool loading on the embankments was evaluated. For the East and West Ash Basins, this condition included a pool elevation 2 feet below the lowest point of the embankment crest (Geosyntec, 2016e).

4.2.2 Static, Maximum Storage Pool Loading – §257.73(e)(1)(ii)

The conditions for §257.73(e)(1)(ii) are identical to §257.73(e)(1)(i) with the exception of the pool elevation, which is set at the lowest points of the embankment crest (Geosyntec, 2016e).

4.2.3 Seismic – §257.73(e)(1)(iii)

Pursuant to §257.73(e)(1)(iii), a seismic condition for East and West Ash Basins was also analyzed. Seismic stability was evaluated with a pseudostatic analysis that uses constant horizontal accelerations to represent the effects of earthquake shaking. The horizontal accelerations are represented in SLOPE/W by a horizontal seismic coefficient. The horizontal seismic coefficient used for analysis was based on a peak ground acceleration with a 2 percent probability of exceedance in 50 years (Geosyntec, 2016g).

4.2.4 Liquefaction – §257.73(e)(1)(iv)

The majority of the embankment soils for the East and West Ash Basins are not considered susceptible to liquefaction because saturation of the embankment soils is unlikely based on the presence of a geomembrane liner system. Based on the design phreatic surface discussed in Geosyntec (2016b), a limited portion of the bottom of the embankments may become saturated from groundwater. Liquefaction triggering analyses of these saturated embankment soils indicate that liquefaction and associated post-liquefaction shear strength loss is unlikely for the seismic design event (Geosyntec, 2016d). Because the likelihood of liquefaction and associated shear strength loss of the embankment soils is very low, post-liquefaction conditions are represented by the static factor of safety analyses.

4.3 Results

The results of the slope stability analysis for the critical cross sections of the East and West Ash Basin embankments are summarized in Table 1 below and presented in Figures 4 through 9 (Geosyntec 2016e).

| Section | Safety Factor | | | |
|---------|-----------------|------------------|-------------------|------------------|
| | 257.73(e)(1)(i) | 257.73(e)(1)(ii) | 257.73(e)(1)(iii) | 257.73(e)(1)(iv) |
| 1 | ≥1.50 | ≥1.40 | ≥1.00 | ≥1.20 |
| 2 | ≥1.50 | ≥1.40 | ≥1.00 | ≥1.20 |

These results meet the factor of safety requirements presented in §257.73(e)(1)(i) through §257.73(e)(1)(iv).

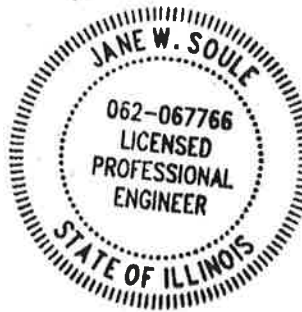
4.4 Retaining Wall Analyses

Stability of the retaining wall located north of the East and West Ash Basins was also evaluated (Geosyntec, 2016h). Construction drawings for the wall were not available, but Geosyntec personnel observed that the wall is a metal bin wall, a form of gravity retaining structure similar to a crib wall, built by combining “bins”, or cells filled with soil. Inputs for the analyses were based on field observations and measurements of the wall the subsurface investigations at the

Site (Geosyntec, 2016h and Geosyntec, 2016b). Factors of safety for bearing capacity, overturning, and sliding were calculated for the wall based on methods for evaluating a cantilever retaining wall in Das (2007). Results show that the factors of safety for the wall exceed minimum industry standard values (Geosyntec, 2016h).

5. Limitations and Certification

This initial periodic structural stability and safety factor assessment meets the requirements of §257.73(d) and §257.73(e) of the Code of Federal Regulations Title 40, Part 257, Subpart D, and was prepared in accordance with current practices and the standard of care exercised by scientists and engineers performing similar tasks in the field of civil engineering. The contents of this report are based solely on the observations of the conditions observed by Geosyntec personnel and information provided to Geosyntec by Midwest Generation. Consistent with applicable professional standards of care, our opinions and recommendations were based in part on data furnished by others, which was consistent with other information that we developed in the course of our performance of the scope of services. The information contained in this report is intended for use solely by Midwest Generation and their subconsultants.



Jane W. Soule

Jane W. Soule, P.E.
Illinois Professional Engineer No. 062-067766
Expiration Date: 11/30/2017

6. References

Das, 2007. "Principles of Foundation Engineering," Sixth edition. Thomson Canada Limited.

Geosyntec, 2016a. History of Construction Report, East and West Ash Basins, Waukegan Station, October.

Geosyntec, 2016b. East and West Ash Basin – Soil Properties Calculation, Waukegan Station, October.

Geosyntec, 2016c. Annual Inspection Report, East and West Ash Basin, Waukegan Station, 18 January 2016.

Geosyntec, 2016d. East and West Ash Basin – Liquefaction Calculations, Waukegan Station, October.

Geosyntec, 2016e. East and West Ash Basin – Slope Stability Calculations, Waukegan Station, October.

Geosyntec, 2016f. Inflow Design Flood Control System Plan, West and East Ash Basins, Waukegan Generating Station, October.

Geosyntec, 2016g. East and West Ash Basin – Seismic Coefficient Calculations, Waukegan Station, October.

Geosyntec, 2016h. East and West Ash Basin – Retaining Wall Calculations, Waukegan, October.

Idriss and Boulanger, 2008. "Soil Liquefaction During Earthquakes". Earthquake Engineering Research Institute, MNO-12.

Attachments

Figure 1 – Site Location

Figure 2 – Pipe Locations

Figure 3 – Slope Stability Cross Sections

Figure 4 – Slope Stability Output, Section 1 - 257.73(e)(1)(i)

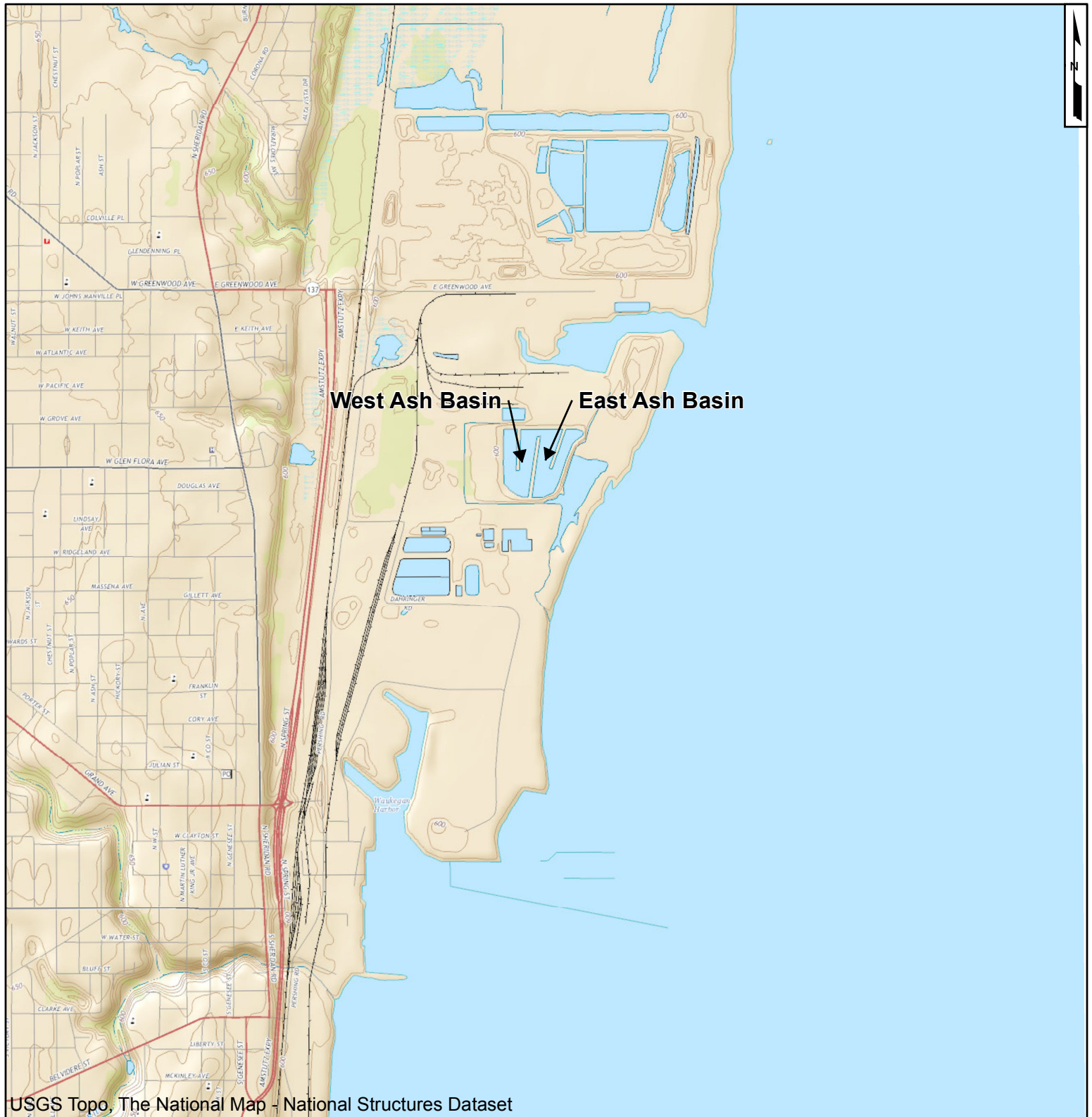
Figure 5 – Slope Stability Output, Section 1 - 257.73(e)(1)(ii)

Figure 6 – Slope Stability Output, Section 1 - 257.73(e)(1)(iii)

Figure 7 – Slope Stability Output, Section 2 - 257.73(e)(1)(i)

Figure 8 – Slope Stability Output, Section 2 - 257.73(e)(1)(ii)

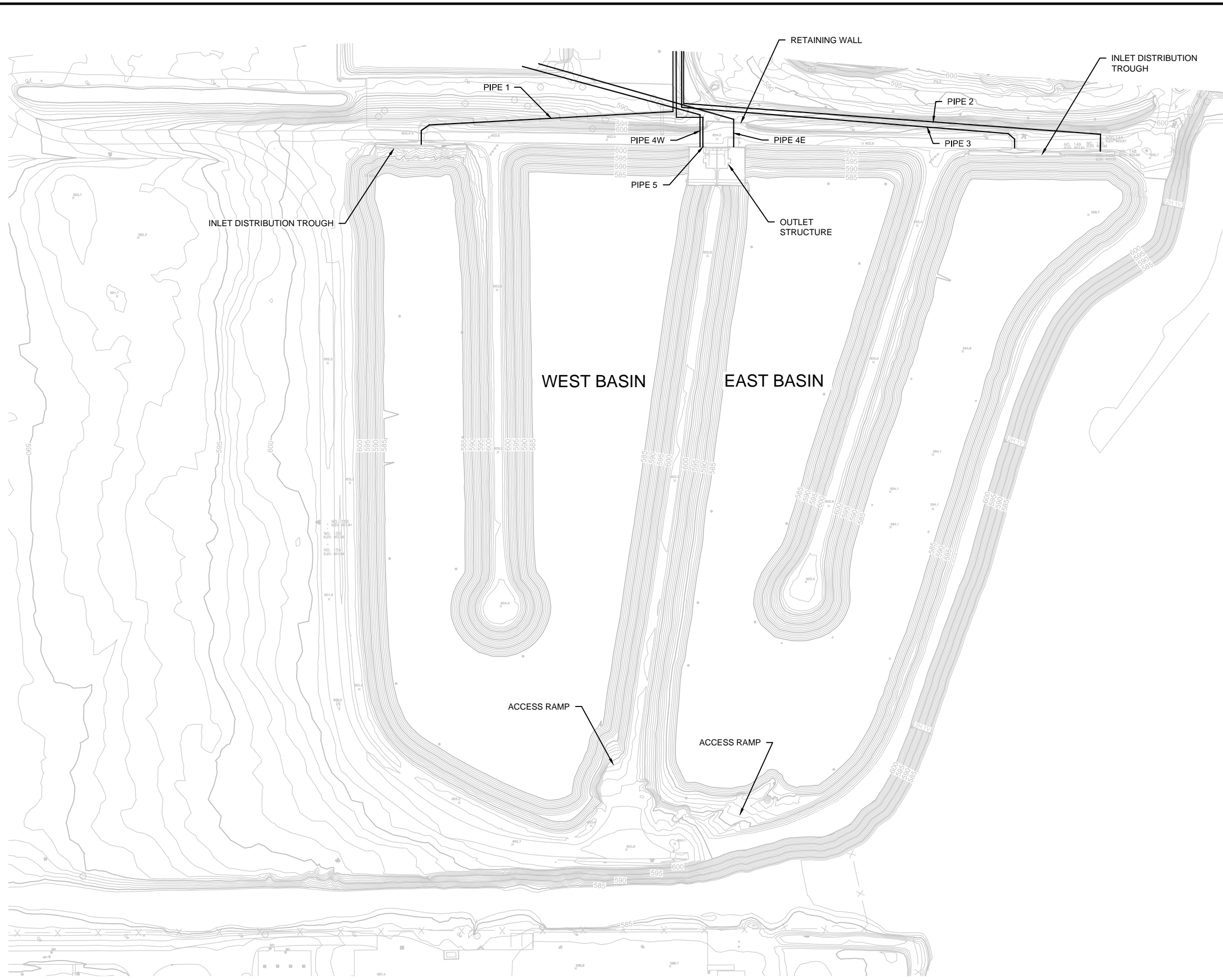
Figure 9 – Slope Stability Output, Section 2 - 257.73(e)(1)(iii)



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|--|--------------|
| 2,000 1,000 0 2,000 Feet | |
| Site Location East and West Ash Basins Waukegan Station Waukegan, Illinois | |
| | |
| San Diego | October 2016 |
| Figure 1 | |

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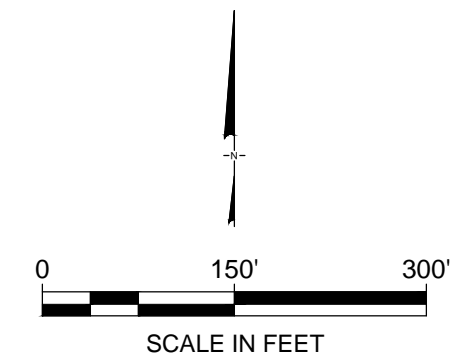


LEGEND

- 600 — EXISTING GROUND MAJOR CONTOUR (5')
- — EXISTING GROUND MINOR CONTOUR (1')
- X EXISTING FENCE
- EXISTING PIPE

NOTES

1. EXISTING PHOTOGRAMMETRIC SURVEY DATA PROVIDED BY GEO TERRA. FLIGHT DATE: 4 DECEMBER 2015. EAST EMBANKMENT GRADING BASED ON EAST ASH BASIN MODIFICATION CONSTRUCTION DRAWINGS BY GEOSYNTEC (2016).
2. ALL PIPE LOCATIONS ARE APPROXIMATE.
3. PIPES 4E AND 4W DISCHARGE TO THE COAL PILE RUNOFF BASIN. LOCATIONS OF THESE UNDERGROUND PIPES ARE ESTIMATED.



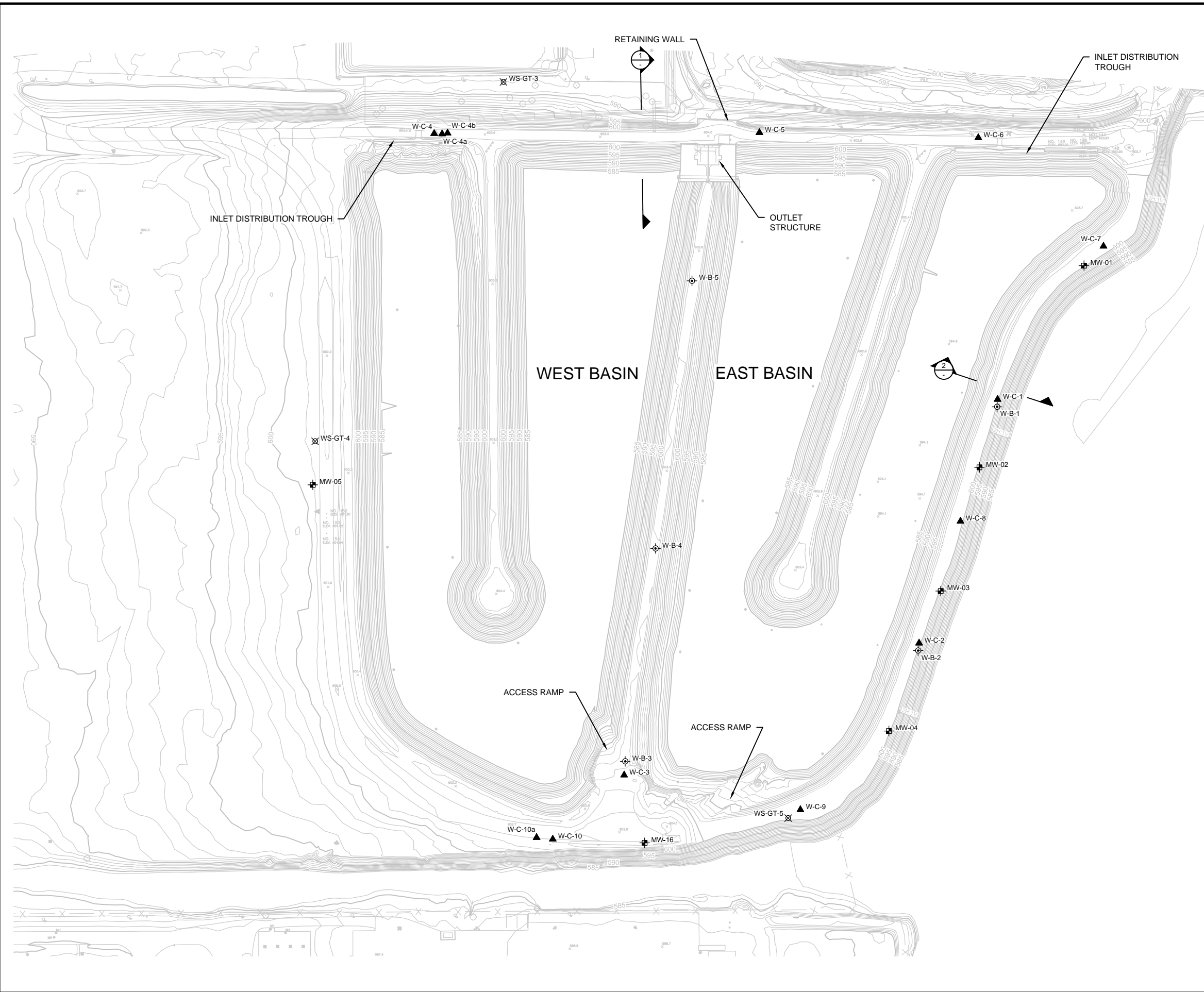
PIPE LOCATIONS
 WEST AND EAST ASH BASINS
 WAUKEGAN STATION
 WAUKEGAN, ILLINOIS



PROJECT NO: SW0251-08

OCTOBER 2016

FIGURE
2

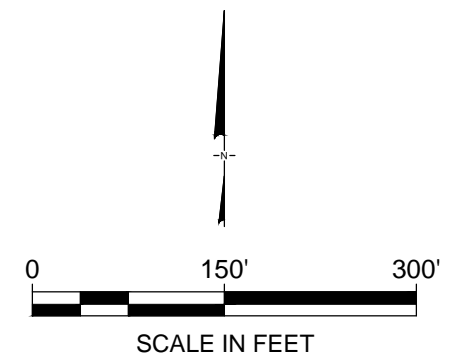


LEGEND

- 600 — EXISTING GROUND MAJOR CONTOUR (5')
- — EXISTING GROUND MINOR CONTOUR (1')
- X EXISTING FENCE
- ⊕ MONITORING WELL (PATRICK, 2011)
- ⊗ BORINGS (KPRG, 2005, 2015)
- ▲ CPT SOUNDING (GEOSYNTEC, 2016)
- ⊕ BORING (GEOSYNTEC, 2016)
- ⊕ —▲ CROSS SECTION LOCATION

NOTES

1. EXISTING PHOTOGRAMMETRIC SURVEY DATA PROVIDED BY GEO TERRA. FLIGHT DATE: 4 DECEMBER 2015. PROPOSED GRADING CONTOURS REFER TO DESIGN GRADES CONTAINED IN EAST ASH BASIN SLOPE MODIFICATION CONSTRUCTION DRAWINGS.
2. ALL EXPLORATION LOCATIONS ARE APPROXIMATE.



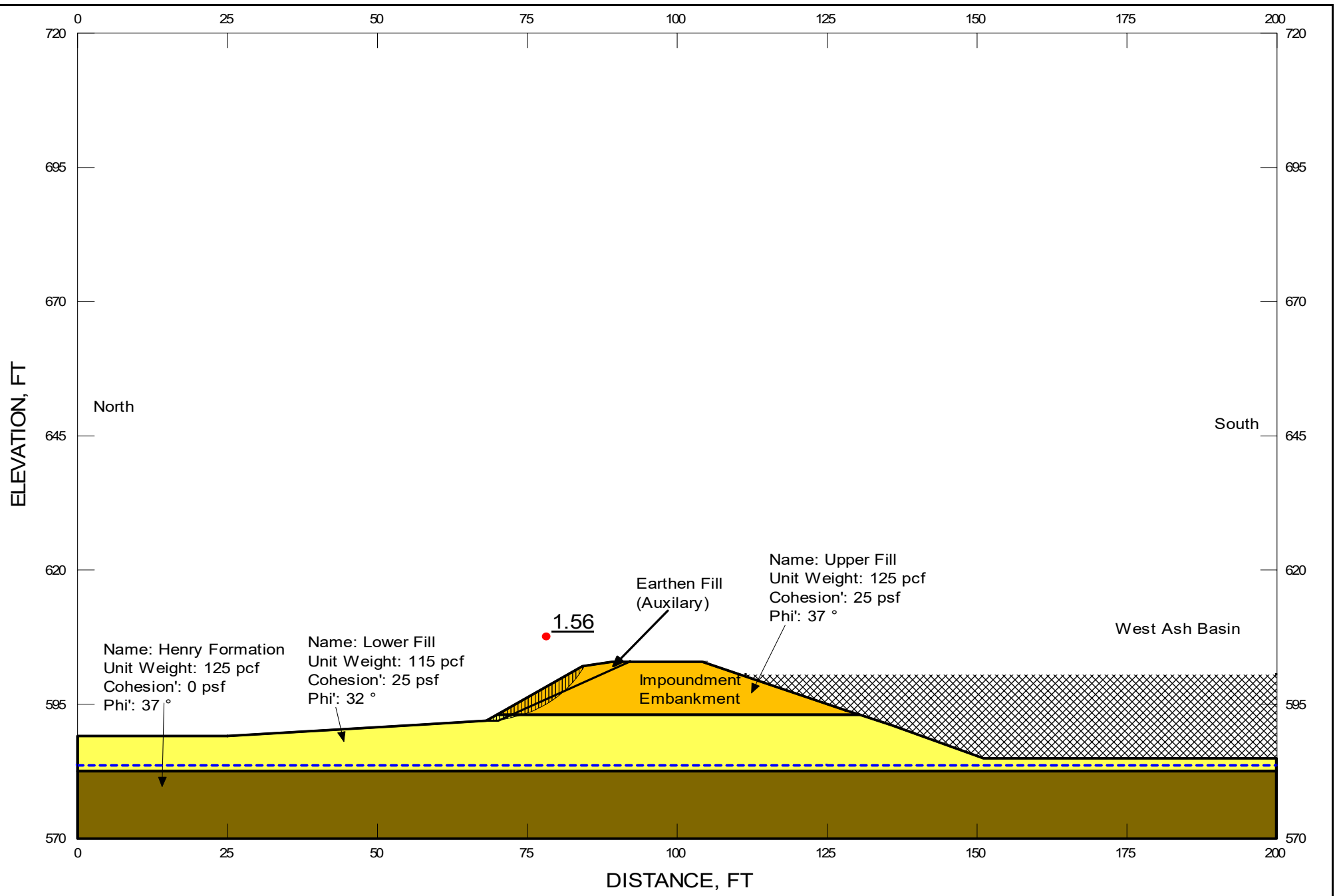
SLOPE STABILITY CROSS SECTIONS
WEST AND EAST ASH BASINS
WAUKEGAN STATION
WAUKEGAN, ILLINOIS



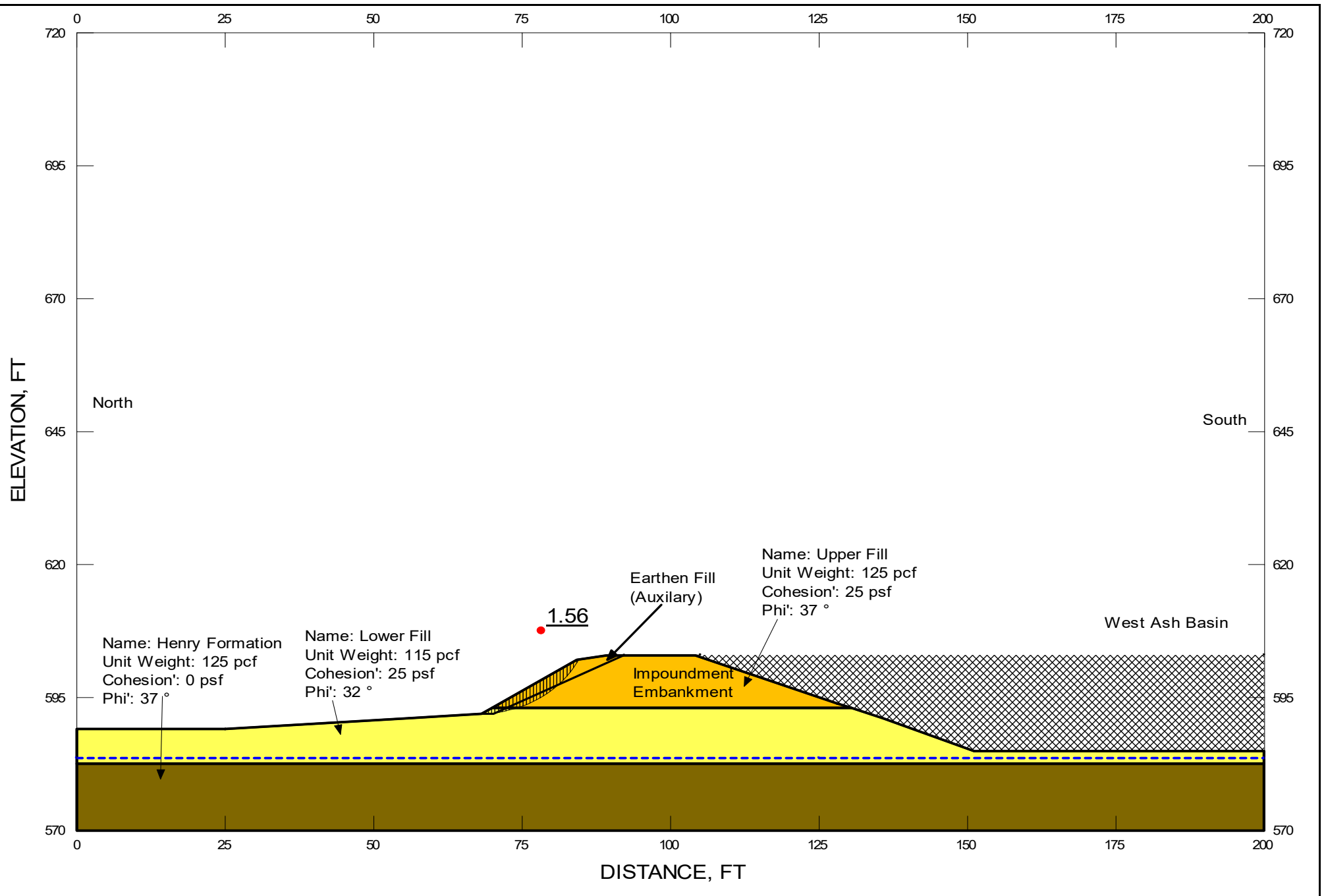
PROJECT NO: SW0251-08

OCTOBER 2016

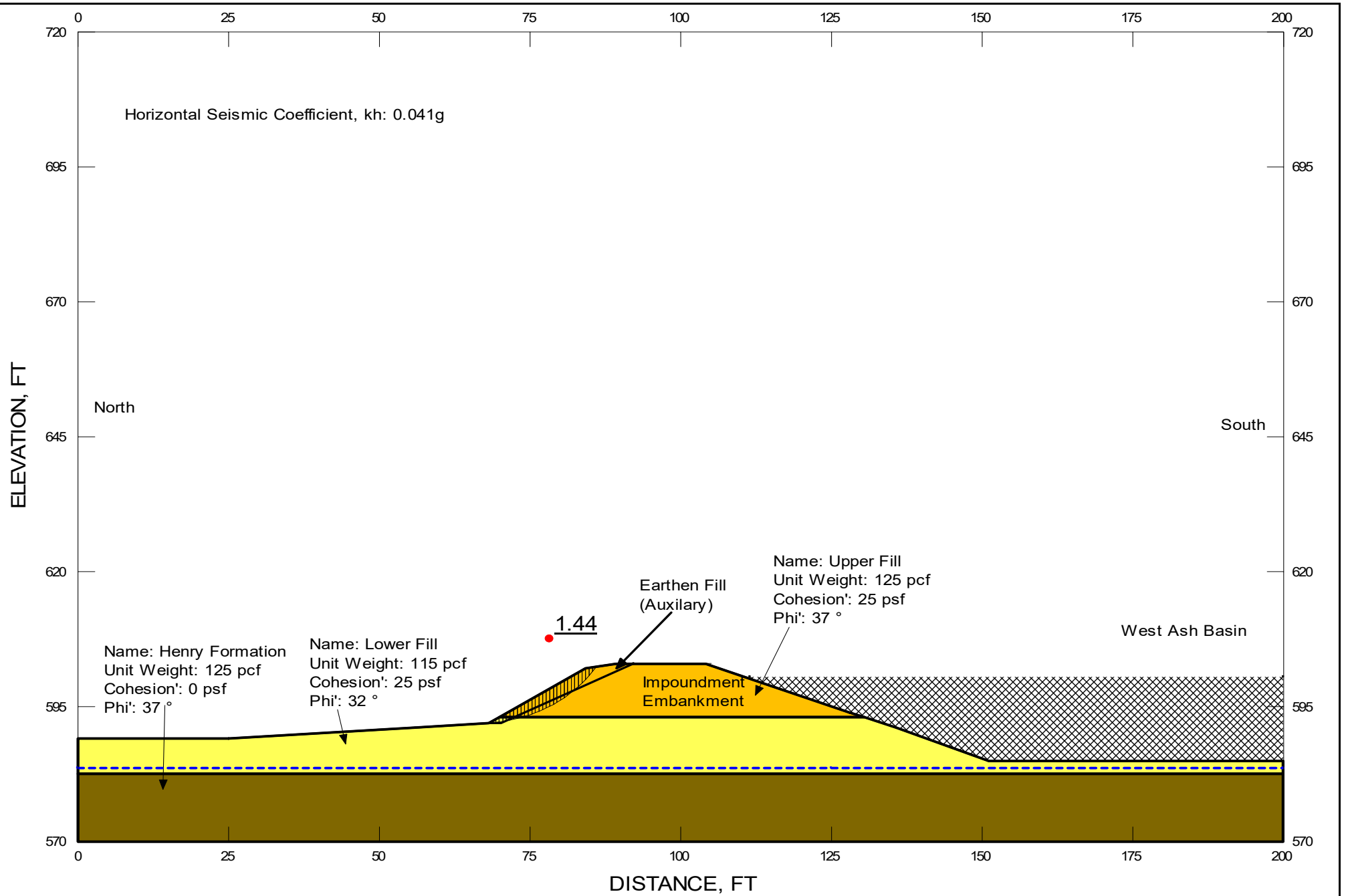
FIGURE
3

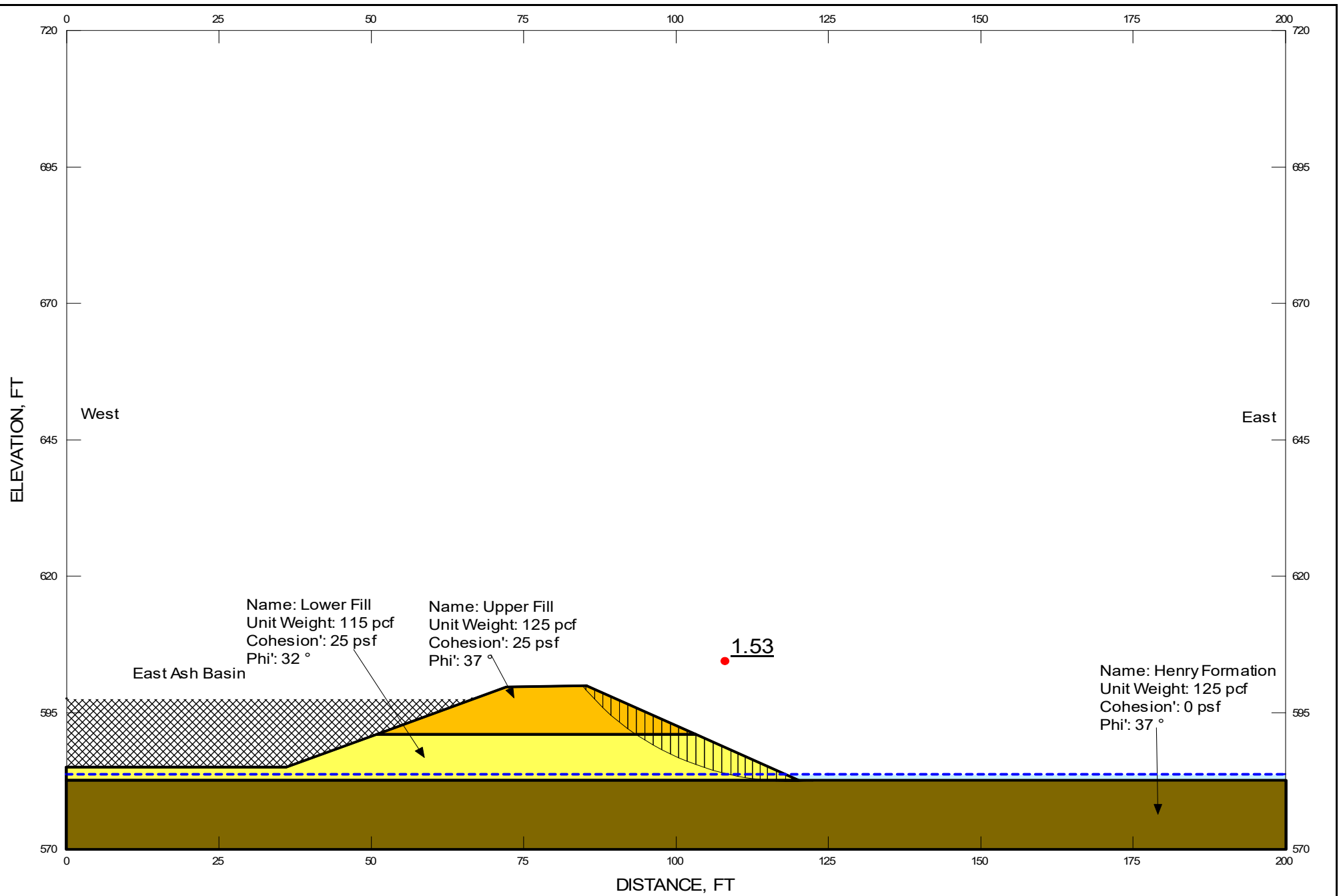


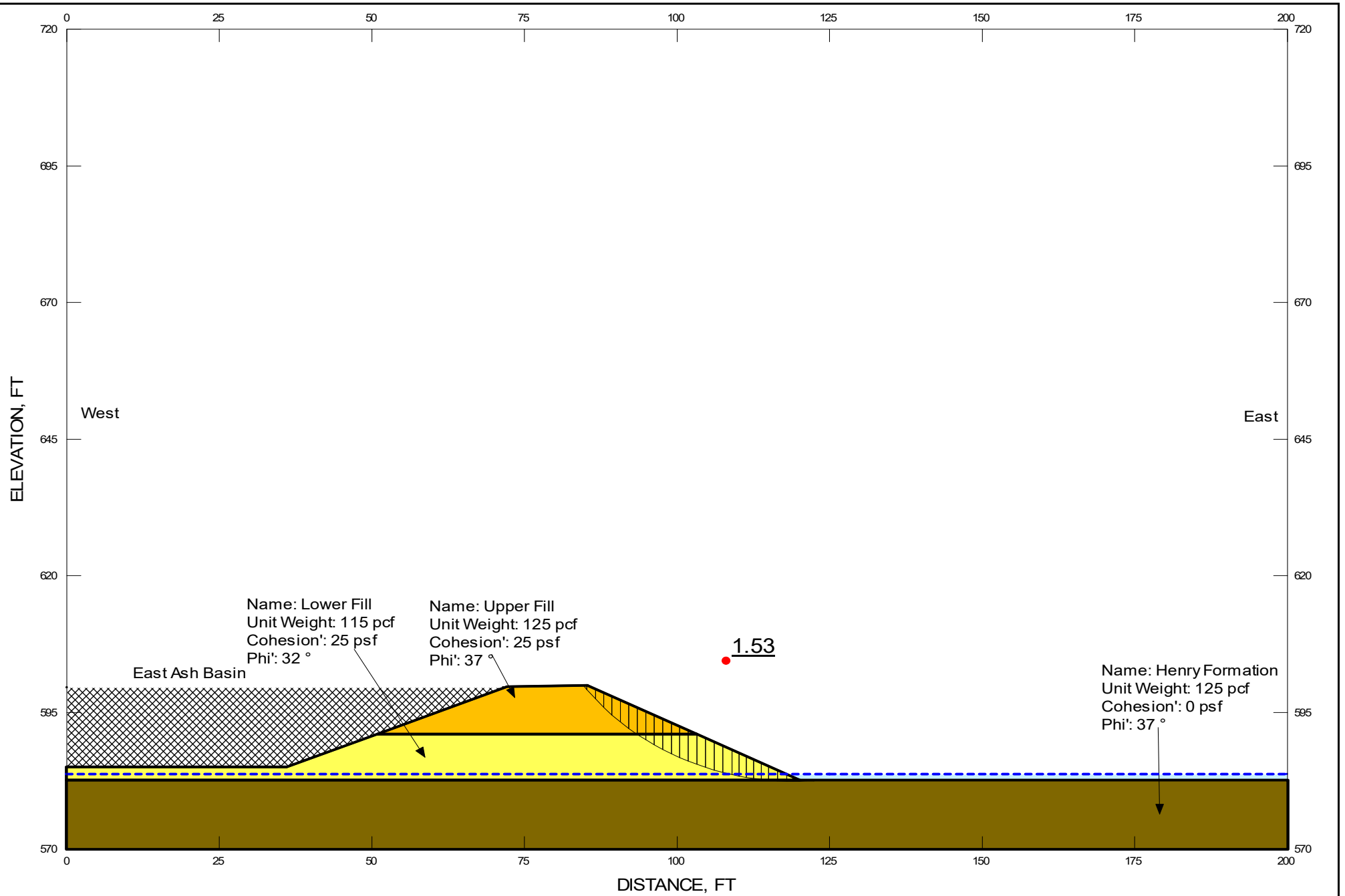
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| Analysis | Section 1 - §257.73(e)(1)(i): Long Term, Maximum Storage Pool Loading | |
| Project | Waukegan East and West Ash Basins | Analysis By Jay Griffin |
| File Name | Waukegan Section 1.gsz | Date October 2016 |



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|-----------|---|-------------------------|
| Analysis | Section 1 - §257.73(e)(1)(ii): Maximum Surcharge Pool Loading | |
| Project | Waukegan East and West Ash Basins | Analysis By Jay Griffin |
| File Name | Waukegan Section 1.gsz | Date October 2016 |







| | | |
|-----------|---|-------------------------|
| Analysis | Section 2 - §257.73(e)(1)(ii): Maximum Surcharge Pool Loading | |
| Project | Waukegan East and West Ash Basins | Analysis By Jay Griffin |
| File Name | Waukegan Section 2.gsz | Date October 2016 |

