

# MWVG

Midwest Generation, LLC

## Waukegan Generating Station

# 2025 Inflow Design Flood Control System Plan for East Ash Pond & West Ash Pond

**Revision 0**

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## EXECUTIVE SUMMARY

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This report presents the 2025 inflow design flood control system plan for the East Ash Pond and West Ash Pond at Midwest Generation, LLC's (MWG) Waukegan Generating Station ("Waukegan" or the "Station"). This annual plan, prepared by Sargent & Lundy (S&L) on behalf of MWG, documents how the inflow design flood control system for the East and West Ash Ponds has been designed and constructed to meet the hydrologic and hydraulic capacity requirements for coal combustion residual (CCR) surface impoundments promulgated by 35 Ill. Adm. Code 845.510.

To complete this assessment, S&L re-evaluated the bases of the most recent hydrologic and hydraulic calculations prepared for the East and West Ash Ponds, which were completed in October 2024. These calculations were performed using a 1,000-year design storm and by conservatively assuming (1) no rainfall abstraction (*i.e.*, the full precipitation depth over a pond's catchment area was assumed to enter the pond) and (2) one foot of water was impounded in each pond at the time of the design storm event, which corresponds to a surface water elevation of 586.00 feet above mean sea level (amsl). To verify that the results of the latest hydrologic and hydraulic calculation were still valid, S&L determined (1) whether any changes to the calculation inputs have occurred since the calculations were performed and (2) whether identified changes warrant updating the calculations. Where changes were determined to impact the results and conclusions of the calculations, the hydrologic and hydraulic calculations were revised in accordance with the updated input. Where no changes were noted for a given input, or where identified changes were determined to have no impact to the results and conclusions of the hydrologic and hydraulic calculations, the previous evaluation of that input was considered to remain valid for this 2025 inflow design flood control system plan.

Operating conditions at the East and West Ash Ponds have not changed since the latest hydrologic and hydraulic calculations were prepared for the ponds in October 2024. The East and West Ash Ponds remain isolated and out of service, and the Recycle Water Sump drain gates remain open to limit water accumulation in the East and West Ash Ponds to one foot of water, essentially leaving the ponds in a constant dewatering state. Therefore, the operating conditions at the East and West Ash Ponds have not changed in a manner since the latest hydrologic and hydraulic calculations were completed that warrant updating the calculations.

Per the ponds' 2025 hazard potential classification assessment prepared in accordance with 35 Ill. Adm. Code 845.440(a)(1), the East and West Ash Ponds remain classified as Class 2 CCR surface impoundments. Therefore, the inflow design flood event for the East and West Ash Ponds remains the 1,000-year storm per 35 Ill. Adm. Code 845.510(a)(3). In addition, there have been no significant

modifications to the embankments for the East and West Ash Ponds (mass excavations, mass fill placement, etc.) since the latest hydrologic and hydraulic calculations were completed in 2024.

Based on the preceding discussion, the results and conclusions documented for the East and West Ash Ponds' inflow design flood control systems in the 2024 inflow design flood control system plan remain valid. Table ES-1 presents the results from the 2024 hydrologic and hydraulic calculations performed for the East and West Ash Ponds at Waukegan in accordance with 35 Ill. Adm. Code 845.510(c)(1). Based on these results, water entering the ponds during the inflow design flood event will not overtop the ponds' crests. The water level in the East and West Ash Ponds during the design event was estimated to be 12.2 and 15.5 feet below the ponds' crests, respectively.

**Table ES-1 – Summary of Hydrologic & Hydraulic Assessment Results for Waukegan East & West Ash Ponds**

| CCR Surface Impoundment | Illinois Hazard Potential Classification | Inflow Design Flood | Maximum Surface Water Elevation | Pond Crest Elevation |
|-------------------------|--|---------------------|---------------------------------|----------------------|
| East Ash Pond           | Class 2                                  | 1,000 Year          | 587.30 feet                     | 599.50 feet          |
| West Ash Pond           | Class 2                                  | 1,000 Year          | 587.00 feet                     | 602.50 feet          |

## **1.0 PURPOSE & SCOPE**

### **1.1 PURPOSE**

The East Ash Pond and the West Ash Pond at Midwest Generation, LLC's (MWG) Waukegan Generating Station ("Waukegan" or the "Station") are existing coal combustion residual (CCR) surface impoundments that are regulated by the Illinois Pollution Control Board's "Standards for the Disposal of Coal Combustion Residuals in CCR Surface Impoundments." These regulations are codified in Part 845 to Title 35 of the Illinois Administrative Code (35 Ill. Adm. Code 845, Ref. 1) and are also referred to herein as the "Illinois CCR Rule." Pursuant to 35 Ill. Adm. Code 845.510(c)(1), MWG must prepare an annual inflow design flood control system plan documenting how the inflow design flood control systems for the East and West Ash Ponds have been designed and constructed to meet the hydrologic and hydraulic capacity requirements for CCR surface impoundments promulgated by 35 Ill. Adm. Code 845.510.

This report documents the 2025 inflow design flood control system plan prepared in accordance with the Illinois CCR Rule by Sargent & Lundy (S&L) on behalf of MWG for the East and West Ash Ponds at Waukegan. This report:

- Lists the inputs and assumptions used to determine whether the East and West Ash Ponds can manage the inflow design flood,
- Discusses the methodology used to prepare the 2025 inflow design flood control system plan,
- Summarizes the results of the latest hydrologic and hydraulic calculations performed to support the conclusion of whether the East and West Ash Ponds meet the hydrologic and hydraulic requirements for CCR surface impoundments promulgated by the Illinois CCR Rule,
- Evaluates potential changes to the inputs used in the latest hydrologic and hydraulic calculations to determine whether new or updated calculations are warranted, and
- Provides the results of the hydrologic and hydraulic calculations used to determine whether the East and West Ash Ponds can manage the inflow design flood.

### **1.2 SCOPE**

In addition to being regulated under the Illinois CCR Rule, Waukegan's East and West Ash Ponds are also regulated by the U.S. Environmental Protection Agency's (EPA) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," 40 CFR Part 257 Subpart D (Ref. 2), also referred to herein as the "Federal CCR Rule." Per the 2016 Water Infrastructure Improvements for the Nation (WIIN) Act, the East and West Ash Ponds will continue to be subject to both the Illinois and Federal CCR Rules until the U.S. EPA approves the Illinois EPA's CCR permit program. However, the scope of this 2025 inflow flood control system plan is strictly limited to demonstrating compliance with the Illinois CCR Rule. Pursuant to 40 CFR 257.82(c)(4), the next inflow design flood control system plan for demonstrating

compliance with the Federal CCR Rule is not required until 2026, five years after the last periodic plan was completed (2021).

## **2.0 INPUTS**

### **Ash Pond Operations & Inflow Design Flood Control System**

The operating and physical conditions for the East and West Ash Ponds and for their inflow design flood control systems were based on the following inputs:

- Observations made during a site visit by S&L on August 28, 2025.
- Discussions with MWG personnel.
- The ponds' initial federal inflow design flood control system plan (Ref. 3).
- The history of construction prepared for the CCR surface impoundments in accordance with 40 CFR 257.73(c) (Ref. 7).
- The 2024 annual inspection report prepared for the CCR surface impoundment in accordance with 35 Ill. Adm. Code 845.540(b) (Ref. 9).
- The weekly inspection reports prepared in accordance with 35 Ill. Adm. Code 845.540(a) since the 2024 inflow design flood control system plan was issued (Ref. 10).

Finally, the area-capacity curves for the ponds were obtained from the aforementioned history of construction (Ref. 7).

### **Inflow Design Flood Event**

Per the ponds' 2025 hazard potential classification assessment (Ref. 4), the East and West Ash Ponds are both classified as Class 2 CCR surface impoundments pursuant to 35 Ill. Adm. Code 845.440(a)(1).

Therefore, the inflow design flood event for both ponds is based on the 1,000-year storm (Ref. 1, § 845.510(a)(3)). Per the National Oceanic and Atmospheric Administration's (NOAA) Atlas 14 (Ref. 5), the precipitation value for the 1,000-year, 24-hour storm event at the Waukegan site is 8.30 inches.

### **Site Topography**

Topographic data for the East Ash Pond, the West Ash Pond, and the surrounding areas was obtained from the photogrammetric survey performed by Geo Terra in 2015 (Ref. 6) that is documented in the ponds' history of construction (Ref. 7).

### **Aerial Images**

Historical and recent aerial images of the Station and surrounding areas were obtained from Google Earth Pro (Ref. 8).

### **3.0 ASSUMPTIONS**

There are no assumptions in this document that require verification.

### **4.0 METHODOLOGY**

The inputs for the latest hydrologic and hydraulic calculations performed for the East and West Ash Ponds, which were completed in October 2024, were reviewed to determine if any changes have occurred since these calculations were completed. Identified changes were then evaluated to determine if updates to these calculations were warranted. If changes were identified, then the hydrologic and hydraulic calculations performed for the East and West Ash Ponds were revised for this 2025 inflow design flood control system plan. Where no changes were noted for a given input, or where identified changes were determined to have no impact to the results and conclusions of the hydrologic and hydraulic calculations, the previous evaluation of that input was considered to remain valid for this 2025 inflow design flood control system plan.

### **5.0 HYDROLOGIC & HYDRAULIC ASSESSMENT**

#### **5.1 SUMMARY OF LATEST HYDROLOGIC & HYDRAULIC CALCULATIONS**

The latest hydrologic and hydraulic calculations for Waukegan's East and West Ash Ponds were completed in October 2024 to account for the modifications made in 2024 to the Station's stormwater management system, which included opening the Recycle Water Sump drain gates to limit water accumulation in the East and West Ash Ponds, essentially leaving the ponds in a constant dewatering state. Because these drain gates are situated one foot above the bottom of each pond, the normal water level in each pond is limited to one foot (Ref. 10). The inputs, methodology, and results of these calculations are documented in the ponds' 2024 inflow design flood control system plan (Ref. 10). As stated in the 2024 plan, these calculations were performed by conservatively assuming (1) no rainfall abstraction (*i.e.*, the full design precipitation depth over a pond's catchment area was assumed to enter the pond) and (2) that the surface water elevations in the ponds at the time of the design storm event were at 586 feet above mean sea level (amsl), which corresponds to one foot of water in each pond. The results of the 2024 assessment indicated that water entering the ponds during the inflow design flood event would not overtop the ponds' dikes. The freeboards in the East and West Ash Ponds during the design event were estimated to be 12.2 feet and 15.5 feet, respectively. Based on these results, it was concluded that the ponds have adequate hydraulic capacities to retain the 1,000-year flood event without water overtopping the ponds' dikes and were therefore in conformance with 35 Ill. Adm. Code 845.510(a).

## **5.2 CHANGES TO INPUTS FOR LATEST HYDROLOGIC & HYDRAULIC CALCULATIONS**

The following subsections summarize the evaluation conducted to determine if changes to the inputs used in the latest hydrologic and hydraulic calculations for the East and West Ash Ponds have occurred since the calculations were completed in 2024 that warrant updating the calculations.

### **5.2.1 CHANGES IN ASH POND OPERATIONS & INFLOW DESIGN FLOOD CONTROL SYSTEMS**

Operating conditions at the East and West Ash Ponds have not changed since the latest hydrologic and hydraulic calculations were prepared for the ponds in October 2024. The East and West Ash Ponds remain isolated and out of service, and the Recycle Water Sump drain gates remain open to limit water accumulation in the ponds to one foot of water, essentially leaving the ponds in a constant dewatering state. Indeed, S&L observed about one foot of water in the West Ash Pond and no appreciable surface water in the East Ash Pond during our site visit on August 28, 2025. Finally, closure construction activities will commence at both ponds upon receipt of closure construction permits from the Illinois EPA in accordance with Subpart B of the Illinois CCR Rule. Thus, there have been no significant changes to the operations of the East and West Ash Pond that warrant updating the 2024 hydrologic and hydraulic calculations for the ponds.

### **5.2.2 CHANGES IN ASH POND TOPOGRAPHY**

Based on visual observations made during S&L's site visit on August 28, 2025, review of the 2024 annual inspection report (Ref. 9), and reviews of Google Earth aerial images (Ref. 8), there have been no significant modifications to embankments for the East and West Ash Ponds (mass excavations, mass fill placement, etc.) since the latest hydrologic and hydraulic calculations were completed in 2024. Therefore, the topographic data (Ref. 6) and the area-capacity curves (Ref. 7) used in the 2024 hydrologic and hydraulic calculations are unchanged and remain valid for use in this 2025 assessment.

### **5.2.3 CHANGES TO INFLOW DESIGN FLOOD EVENT**

Per the ponds' 2025 hazard potential classification assessment (Ref. 4), the East and West Ash Ponds are both classified as Class 2 CCR surface impoundments pursuant to 35 Ill. Adm. Code 845.440(a)(1), the same hazard potential classifications the ponds were assigned in 2024. Therefore, the inflow design flood event for both ponds remains the 1,000-year storm (Ref. 1, § 845.510(a)(3)). As documented in the ponds' 2024 inflow design flood control system plan (Ref. 10), the precipitation value for the 1,000-year, 24-hour storm event used in the latest hydrologic and hydraulic calculations completed for the East and West Ash Ponds was 8.30 inches per NOAA's Atlas 14. NOAA's 1,000-year, 24-hour precipitation value for the Waukegan site remains 8.30 inches (Ref. 5). Therefore, the inflow design flood event used in the 2024 hydrologic and hydraulic calculations is unchanged and remains valid for use in this 2025 assessment.

### 5.3 RESULTS

There have been no significant modifications to the East and West Ash Ponds and no changes to the ponds' inflow design flood event since the latest hydrologic and hydraulic calculations were prepared in 2024. Therefore, the results and conclusions documented for the East and West Ash Ponds' inflow design flood control systems in the 2024 inflow design flood control system plan (Ref. 10) remain valid.

Table 5-1 summarizes the results from the latest hydrologic and hydraulic calculations performed for the East and West Ash Ponds. Based on these results, water entering the ponds during the inflow design flood event will not overtop the ponds' dikes. The freeboards in the East and West Ash Ponds during the design event were estimated to be 12.2 feet and 15.5 feet, respectively.

**Table 5-1 – Summary of Hydrologic & Hydraulic Assessment Results for Waukegan East & West Ash Ponds**

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### 6.0 CONCLUSIONS

Based on the results in Table 5-1, Waukegan's East and West Ash Ponds have adequate hydraulic capacities to retain the 1,000-year flood event without water overtopping the ponds' dikes. Therefore, the East and West Ash Ponds are able to collect and control the inflow design flood event specified in 35 Ill. Adm. Code 845.510(a)(3).

### 7.0 CERTIFICATION

I certify that:

- This inflow design flood control system plan was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.510.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: Thomas Dehlin

Date: October 13, 2025

Seal:



## 8.0 REFERENCES

1. Illinois Pollution Control Board. "Standards for Disposal of Coal Combustion Residuals in CCR Surface Impoundments." 35 Ill. Adm. Code 845. Accessed September 30, 2025.
2. U.S. Environmental Protection Agency. "Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments." 40 CFR Part 257 Subpart D. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-257/subpart-D>. Accessed September 30, 2025.
3. Geosyntec Consultants. "Inflow Design Flood Control System Plan, Ash Pond 2, Waukegan Station." October 2016.
4. Sargent & Lundy. "2025 Hazard Potential Classification Assessment for East Ash Pond & West Ash Pond." Rev. 0. S&L Project No. A12661.198. October 2025.
5. National Oceanic and Atmospheric Administration. "Point Precipitation Frequency Estimates." NOAA Atlas 14, Volume 2, Version 3.
6. Geo Terra. Aerial Survey of Waukegan Generating Station Dated December 4, 2015.
7. Geosyntec Consultants. "History of Construction, East and West Ash Basins, Waukegan Station." October 2016.
8. Google Earth Pro v7.3.0.3832. Accessed September 30, 2025.
9. Civil & Environmental Consultants, Inc. "Annual Inspection Report, East Ash Pond and West Ash Pond, Waukegan Station." October 18, 2024.
10. Midwest Generation, LLC. "IL Weekly and Monthly Inspection." 2024 Week 40 through 2025 Week 38. Accessed via <https://midwestgenerationllc.com/illinois-ccr-rule-compliance-data-and-information/>.
11. Sargent & Lundy. "2024 Inflow Design Flood Control System Plan for East Ash Pond & West Ash Pond." Rev. 0. S&L Project No. A12661.187. October 13, 2024.