

MWVG

Midwest Generation, LLC

Waukegan Generating Station

2025 Hazard Potential Classification Assessment for East Ash Pond & West Ash Pond

Revision 0

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EXECUTIVE SUMMARY

This report presents the 2025 hazard potential classification assessment for the East Ash Pond and West Ash Pond at Midwest Generation, LLC's (MWG) Waukegan Generating Station ("Waukegan" or the "Station"). Pursuant to 35 Ill. Adm. Code 845.440(a)(1), this annual assessment, prepared by Sargent & Lundy (S&L) on behalf of MWG, documents the hazard potential classification for each pond in accordance with the hazard potential classifications defined in 35 Ill. Adm. Code 845.120.

Per last year's hazard potential classification assessment, the East and West Ash Ponds were each designated as a Class 2 CCR surface impoundment pursuant to 35 Ill. Adm. Code 845.440(a)(1), which is the equivalent of a significant hazard potential CCR surface impoundment under 40 CFR 257.53, after it was determined that the bases for the initial federal hazard potential classifications assigned to the two ponds in 2016 in accordance with 40 CFR 257.73(a)(2) were still valid. Accordingly, to complete this assessment, S&L re-evaluated the bases of the initial federal hazard potential classifications assigned to the two ponds to determine (1) if any changes have occurred since the initial assessment was completed and (2) whether identified changes warrant adjusting the ponds' 2024 hazard potential classifications.

Based on the evaluation of the key hazard potential classification criteria for the East and West Ash Ponds, there have been significant operational changes made at the Station since the initial federal hazard potential classification assessment was completed in 2016. The Station's decommissioning efforts subsequent to the retirement of Units 7 and 8 in June 2022 have reduced the number of occupied buildings at the Station and limit the maximum operating water level in the East and West Ash Ponds to approximately 1 foot, substantially lower than their original design operating levels. Moreover, the only water entering the East and West Ash Ponds is direct precipitation (i.e., rain or snow) and run-off from the crests of the ponds' dikes. No other significant changes to the other bases used to determine the ponds' initial federal hazard potential classifications were noted (topography, downstream developments, depth-velocity flood danger level relationships).

Consistent with the initial dike breach analyses conducted in 2016, hypothetical dike breaches at the East and West Ash Ponds' northern and southern dikes were evaluated under the ponds' current operating conditions to assess potential impacts to the Station and Waukegan Water Reclamation Facility (WWRF) buildings downstream of the ponds. These assessments were performed independent of potential causes and/or apparent dike stability. The water levels in both ponds were assumed to be 2.6 feet, which was based on the normal operating water level (1 foot) and the probable maximum precipitation (PMP) depth for the Waukegan site (19 inches). Finally, consistent with the 2016 dike breach analyses, it was assumed that a hypothetical failure at either pond's southern dike occurred concurrently with the peak flow of stormwater

within the unnamed channel south of the pond during the probable maximum flood (PMF) event for the drainage area.

Table ES-1 presents the maximum flow depth and maximum flow velocity estimated near occupied Station and WWRF buildings for each of the four failure scenarios evaluated (one per each pond’s north and south dikes). The table also presents the average reduction in maximum flow velocity from the 2016 dike breach analysis for each of the four hypothetical dike breach scenarios. Per this table, the updated dike breach analyses for the East and West Ash Ponds’ northern and southern dikes estimated significant reductions in maximum flow velocities near buildings from the resulting floods and a reduction in the corresponding inundation areas. These observed reductions in maximum flow velocities are a direct consequence of the significant reductions made to the East and West Ash Pond’s storage capacities when the Station took the ponds out of service and opened the Recycle Water Sump’s drain gates.

Table ES-1 – Maximum Flood Characteristics from Updated Dike Breach Analyses

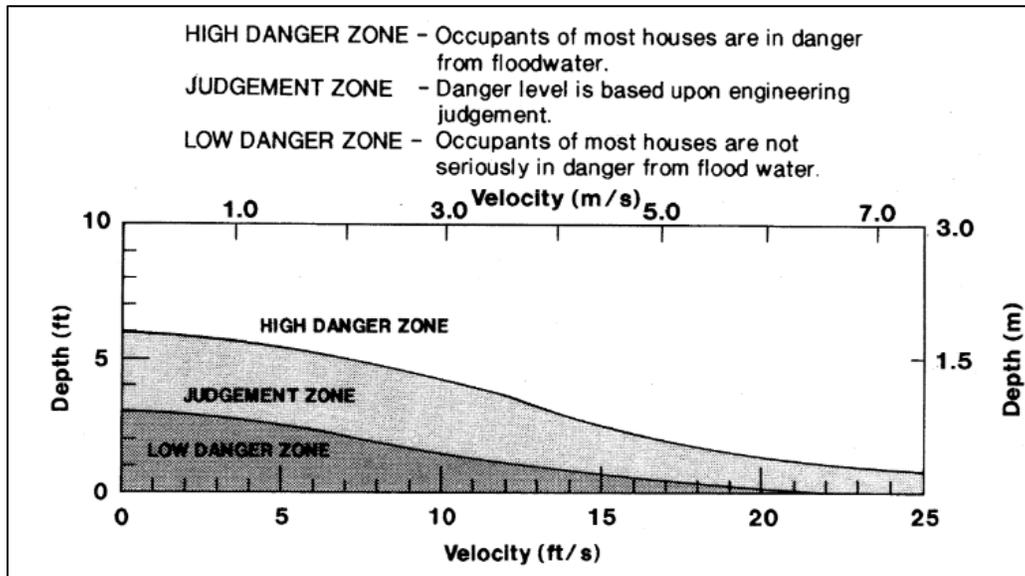
CCR Surface Impoundment	Dike of Interest	Maximum Estimated Flow Depth Near Occupied Buildings	Maximum Estimated Flow Velocity Near Occupied Buildings	Average Reduction in Maximum Flow Velocity (2016 to 2025)
East Ash Pond	South Dike	2.0 feet	1.7 fps	78.3%
West Ash Pond	South Dike	2.1 feet	1.9 fps	80.9%
East Ash Pond	North Dike	1.8 feet	0.6 fps	89.4%
West Ash Pond	North Dike	1.7 feet	0.6 fps	78.5%

Based on the U.S. Department of the Interior, Bureau of Reclamation’s (USBR) depth-velocity flood danger level relationship presented in Figure 2 the bureau’s “Downstream Hazard Classification Guidelines” (reproduced in Figure ES-1 below), conservatively combining the maximum estimated flow depth and maximum estimated flow velocity near occupied buildings would result in a flood-depth velocity combination that plots within the “Low Danger Zone,” which is the zone where “the number of lives-in-jeopardy associated with possible downstream hazards is assumed to be zero.” Therefore, a failure at either of the East and West Ash Ponds’ northern or southern dikes would not result in a probable loss of human life at the occupied Station and WWRF buildings.

Per the updated dike breach analyses performed in support of this hazard potential classification assessment, a loss of human life is unlikely to result from a hypothetical failure under the East and West Ash Ponds’ current operating conditions. This is the primary consideration for classifying the hazard potential for a CCR surface impoundment under the Illinois CCR Rule. If a loss of human life is likely to occur, then the

CCR surface impoundment is a Class 1 hazard potential; otherwise, it is a Class 2 hazard potential. Because a hypothetical failure at either pond will not cause a probable loss of human life, both the East and West Ash Ponds are classified as Class 2 CCR surface impoundments in accordance with 35 Ill. Adm. Code 845.440(a)(1).

Figure ES-1 – USBR Flood Depth-Velocity Danger Zones



The East and West Ash Ponds' classifications as Class 2 CCR surface impoundments are not reflections of the potential for the impoundments to fail. The 2025 annual safety factor assessment conducted pursuant to 35 Ill. Adm. Code 845.460 shows that the East and West Ash Ponds are stable under design operating conditions. Moreover, no visual signs of distress that could be indicative of dike instability were observed during the August 28, 2025, condition assessment performed by S&L in support of the ponds' 2025 annual structural stability assessment under 35 Ill. Adm. Code 845.450.

Table ES-2 presents the 2025 hazard potential classifications assigned to the Waukegan East and West Ash Ponds under their current operating conditions in accordance with 35 Ill. Adm. Code 845.440(a)(1).

Table ES-2 – 2025 Illinois Hazard Potential Classifications for East Ash Pond & West Ash Pond at the Waukegan Generating Station

CCR Surface Impoundment	2025 Illinois Hazard Potential Classification
East Ash Pond	Class 2
West Ash Pond	Class 2

1.0 PURPOSE & SCOPE

1.1 PURPOSE

The East Ash Pond and 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 845.440(a)(1), MWG must conduct and complete an annual hazard potential classification assessment that documents the hazard potential classifications for the East and West Ash Ponds in accordance with the hazard potential classifications defined in 35 Ill. Adm. Code 845.120.

This report documents the 2025 hazard potential classification assessment conducted and completed 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 in the 2025 hazard potential classification assessment,
- Lists and compares the definitions for the hazard potential classifications for CCR surface impoundments promulgated by the Illinois CCR Rule and by the U.S. Environmental Protection Agency's regulations for CCR surface impoundments,
- Discusses the methodology used to conduct the 2025 hazard potential classification assessment,
- Provides the 2025 hazard potential classifications for the East and West Ash Ponds in accordance with 35 Ill. Adm. Code 845.440(a)(1).

1.2 SCOPE

In addition to being regulated under the Illinois CCR Rule, the East and West Ash Ponds at Waukegan 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 hazard potential classification assessment is strictly limited to demonstrating compliance with the Illinois CCR Rule. Pursuant to 40 CFR 257.73(f)(3), the next hazard potential classification assessment for demonstrating compliance with the Federal CCR Rule will be completed in 2026, five years after the last federal assessment was completed (2021).

2.0 INPUTS

Hazard Potential Classifications

The Illinois CCR Rule (Ref. 1, § 845.120) defines “hazard potential classification” as “the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances.”

The Illinois CCR Rule (Ref. 1, § 845.440(a)(1)) requires a CCR surface impoundment be designated as either a Class 1 CCR surface impoundment or a Class 2 CCR surface impoundment. Per 35 Ill. Adm. Code 845.120, the two Illinois hazard potential classifications are defined as follows:

- *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 Federal CCR Rule (Ref. 2, § 257.53) has the same definition for “hazard potential classification” as the Illinois CCR Rule. However, the Federal CCR Rule has three hazard potential classifications instead of the two designations promulgated by the Illinois CCR Rule. Per 40 CFR 257.53, the three federal hazard potential classifications are defined as follows:

- *High hazard potential CCR surface impoundment* means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- *Low hazard potential 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 impoundment owner’s property.
- *Significant hazard potential 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.

Per the preceding sets of definitions for the federal and Illinois hazard potential classifications, a high hazard potential CCR surface impoundment per the Federal CCR Rule is the same as a Class 1 CCR surface impoundment per the Illinois CCR Rule. Similarly, a CCR surface impoundment that is classified as a low or significant hazard potential per the Federal CCR Rule is considered to be a Class 2 CCR surface impoundment per the Illinois CCR Rule.

Table 2-1 summarizes the hazard potential classifications for CCR surface impoundments under the Illinois and Federal CCR Rules as defined by the preceding criteria. By comparison, a high hazard potential CCR surface impoundment per the Federal CCR Rule is the same as a Class 1 CCR surface impoundment per

the Illinois CCR Rule. Similarly, a CCR surface impoundment that is classified as a low or significant hazard potential per the Federal CCR Rule is considered to be a Class 2 CCR surface impoundment per the Illinois CCR Rule.

Table 2-1 – Federal and Illinois Hazard Potential Classifications and Classification Criteria

Illinois Hazard Potential Classification	Federal Hazard Potential Classification	Loss of Human Life	Economic, Environmental, Lifeline Losses and/or Disruptions
Class 2	Low	Not Probable	Low and Principally Limited to Owner
	Significant	Not Probable	Yes
Class 1	High	Probable	Not Necessary for This Classification

A CCR surface impoundment’s hazard potential classification is not a reflection of the probability of a hypothetical failure event associated with the surface impoundment. Hazard potential classifications are not contingent upon a CCR surface impoundment’s structural stability; they only classify the potential impacts should a hypothetical failure occur. For example, a well-maintained CCR surface impoundment with appropriate factors of safety may be classified as a Class 1 hazard potential solely because a loss of human life would be probable if a hypothetical failure event did occur. Instead, the structural integrity of a CCR surface impoundment and its potential for failure are evaluated and documented in the structural stability and safety factor assessments prepared pursuant to 35 Ill. Adm. Code 845.450 (Ref. 3) and 35 Ill. Adm. Code 845.460 (Ref. 4).

2016 Dike Breach Analyses & Initial Hazard Potential Classification Assessments

As documented in last year’s hazard potential classification assessment, the 2024 hazard potential classifications assigned to the East and West Ash Ponds were based on the initial federal hazard potential classifications assigned in 2016 pursuant to the Federal CCR Rule (Ref. 5) after it was determined that the bases for the initial federal hazard potential classifications were still valid. The inputs, assumptions, and methodology used to determine the ponds’ initial hazard potential classifications, including the 2016 dike breach analyses and inundation maps (Refs. 6 and 7), were re-evaluated to determine whether any updates to these analyses were warranted.

Probable Maximum Precipitation Depth

Per the National Oceanic Atmospheric Administration’s (NOAA) Hydrometeorological Report No. 51 (Ref. 8), *probable maximum precipitation (PMP)* means theoretically the greatest depth of precipitation for a given duration that is physically possible over a given size storm area at a particular geographical location at

certain time of the year. The Illinois State Water Survey has developed PMP depth estimates for dam safety projects that are specific to the State of Illinois, smaller watersheds, and four storm distributions. Table 2-2 present the PMP depth estimates for the four storm durations (quartiles) over drainage areas less than one square mile in the Illinois Northwest Region, where the Waukegan site is located (Ref. 9).

Table 2-2 – Probable Maximum Precipitation (PMP) Depths for Waukegan Site

Quartile	Storm Duration (hr)	PMP Depth (in.)
1 st	6	14.8
2 nd	12	16.3
3 rd	24	17.8
4 th	48	19.0

Site Topography

Two topographic datasets for the East Ash Pond, the West Ash Pond, and the surrounding areas were reviewed: one from the U.S. Geological Survey’s (USGS) National Elevation Dataset (NED) (Ref. 10) and one from the Illinois State Geological Survey’s (ISGS) Illinois Geospatial Data Clearinghouse (Ref. 11). The USGS dataset was published in 2011 and was utilized in the initial federal hazard potential classification assessment for the East and West Ash Ponds and the 2016 dike breach analyses that were the bases for the ponds’ initial federal hazard potential classifications. The USGS topography reflects elevation data collected in 2007 at a resolution of approximately 3 meters. Based on a review of the USGS NED, the 2007 USGS elevation dataset is the most recent topographic dataset at a 3-meter or better resolution for the Station and surrounding areas. Meanwhile, the ISGS topography reflects elevation data collected in 2017 at a 1-meter resolution and was utilized in this 2025 assessment. This topographic dataset is the most recent dataset collected by ISGS for Lake County, Illinois.

Aerial Images

Historical and recent aerial images of the Station and surrounding areas were obtained from Google Earth Pro (Ref. 12).

Property Boundaries

Boundaries for the Station’s property and adjacent properties were obtained from the geographic information system (GIS) for Lake County, Illinois (Ref. 13).

Ash Pond Conditions

The operating and physical conditions for the East and West Ash Ponds were based on the following inputs:

- Observations made during a site visit by S&L on August 28, 2025.

- Discussions with MWG personnel.
- The annual inspection reports prepared for the CCR surface impoundments in accordance with 40 CFR 257.83(b) and 35 Ill. Adm. Code 845.540(b) (Refs. 14 through 21).
- The weekly inspection reports prepared in accordance with 35 Ill. Adm. Code 845.540(a) since the 2024 hazard potential classification assessment was issued (Ref. 22).

3.0 ASSUMPTIONS

There are no assumptions in this document that require verification.

4.0 METHODOLOGY

As documented in last year's hazard potential classification assessment, the 2024 hazard potential classifications assigned to the East and West Ash Ponds were based on the initial federal hazard potential classifications assigned in 2016 pursuant to the Federal CCR Rule after it was determined that the bases for the initial federal hazard potential classifications had either not changed or were very conservative under present operating conditions. Accordingly, for this 2025 assessment, the bases for the East and West Ash Ponds' initial federal hazard potential classifications were re-evaluated to determine if any changes have occurred since the initial assessment was completed. Identified changes were then evaluated to determine if the 2016 dike breach analyses warrant re-evaluation.

5.0 ASSESSMENT

5.1 SUMMARY OF 2024 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

The previous hazard potential classification assessment for the East and West Ash Ponds was completed on October 13, 2024. Ultimately, the 2024 hazard potential classifications for the East and West Ash Ponds were based on the initial federal hazard potential classifications that were assigned to the ponds in 2016 after it was determined that the bases for the initial federal hazard potential classifications were still valid, albeit very conservative for the ponds' present operating conditions. Per the initial federal hazard potential classification assessment for the East and West Ash Ponds, the ponds were classified as significant hazard potential CCR surface impoundments pursuant to 40 CFR 257.53. Based on the comparison between the Federal and Illinois CCR Rules' definitions for hazard potential classifications in Section 2.0, a significant hazard potential CCR surface impoundment under the Federal CCR Rule is the equivalent of a Class 2 CCR surface impoundment under the Illinois CCR Rule. Therefore, the East and West Ash Ponds were classified as Class 2 CCR surface impoundments in the 2024 hazard potential classification assessment.

5.2 CHANGES IN BASES FOR INITIAL FEDERAL HAZARD POTENTIAL CLASSIFICATIONS

The 2016 federal hazard potential classifications for the East and West Ash Pond were based on hypothetical dike breach analyses conducted for the northern and southern dike of each pond (Refs. 6 and 7), which were determined to pose the most risk to human life due to the proximities of occupied Station buildings (north) and the Waukegan Water Reclamation Facility (WWRF) (south) downstream of the ponds. The 2016 dike breach analyses also assumed the East and West Ash Ponds were at their full operating capacities at the time of a hypothetical failure. Finally, the analyses assumed that a hypothetical failure occurred concurrently with the probable maximum precipitation (PMP) event for the area. These key criteria are re-evaluated under present-day conditions to determine if the 2016 dike breach analyses – and, by extension, the East and West Ash Ponds’ initial federal hazard potential classifications – warrant re-evaluation.

5.2.1 CHANGES IN STATION OPERATIONS

In 2016, Waukegan operated two coal-fired electric generating units, Units 7 and 8. At that time, the Station managed CCR wastestreams and various non-CCR wastestreams from the electric power generation process in the East and West Ash Ponds. The ponds were operated in parallel; only one pond would be in service at any one time. While CCR and non-CCR wastestreams were being conveyed into one pond, the Station would empty and clean the out-of-service pond to recover working storage capacity.

In June 2020, Waukegan took the West Ash Pond out of service for routine cleaning. In April 2021, MWG filed a notice of intent to close the West Ash Pond in accordance with the Federal CCR Rule’s closure criteria (Ref. § 257.102). Then, in June 2022, Units 7 and 8 were retired and Waukegan subsequently ceased placing CCR wastestream into the East Ash Pond. The Station continued to use the East Ash Pond to manage stormwater run-off from the Station property until May 2024 after modifications were made to isolate the East Ash Pond from the Station’s stormwater management system. After ceasing the placement of stormwater run-off into the pond, MWG filed a notice of intent to close the East Ash Pond in June 2024. Closure construction activities will commence at the East and West Ash Ponds upon receipt of closure construction permits from the Illinois EPA in accordance with Subpart B of the Illinois CCR Rule.

As a part of the modifications made in 2024 to the Station’s stormwater management system, the Station opened the Recycle Water Sump drain gates to lower the water level in the East Ash Pond, and the Station continues to keep these gates open 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 will be limited to approximately one foot (Ref. 22). 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.

As previously stated, the 2016 federal hazard potential classification assessment for the East and West Ash Ponds examined hypothetical breach scenarios assuming both ponds were operating and at their original design capacities. Currently, the only water entering the East and West Ash Ponds is direct precipitation (i.e., rain or snow) and run-off from the crests of the ponds’ dikes. Moreover, the opened Recycle Water Sump drain gates limit the amount of stormwater that can accumulate in the ponds. Therefore, the assumed operating conditions used for the initial assessment are very conservative for the ponds’ current operating conditions.

5.2.2 CHANGES IN DOWNSTREAM PROPERTY DEVELOPMENTS

Appendix A provides a Building Occupancy Map for the site, updated from a similar map included in the initial 2016 federal hazard potential classification assessment. The numbers used to identify buildings at the Station and at the WWRF are consistent with the 2016 map and are used for identification purposes only; they do not correspond to identification numbers assigned by the Station or the WWRF.

Table 5-1 presents a comparison of the building occupancy status at the Station and WWRF since the initial federal hazard potential classification assessments was completed in 2016. Based on reviews of Google Earth aerial images (Ref. 12) and the Lake County, Illinois GIS (Ref. 13), no new buildings or transport corridors (roads, rail lines, etc.) have been constructed in the past nine years within the dike breach impact areas identified in the initial federal hazard potential classification assessment. However, due to the retirement of Units 7 and 8 in June 2022, the main power block and the rail car dumper building, identified as Building 7 in Appendix A, are now classified as unoccupied buildings. Therefore, the Station currently has only two occupied buildings, identified as Buildings 3 and 10 in Appendix A. Finally, consistent with the initial 2016 federal hazard potential classification assessment, all of the WWRF buildings are conservatively assumed to be occupied buildings.

Table 5-1 – Comparison of Station and WWRF Building Occupancy Status Since 2016 Federal Hazard Potential Classification Assessment¹

Building ID ²	2016 Occupancy Status ³	2025 Occupancy Status
Station Main Power Block	Occupied	Unoccupied
Station Building 1	Unoccupied	Unoccupied
Station Building 2	Unoccupied	Unoccupied
Station Building 3	Unoccupied	Unoccupied
Station Building 4	Unoccupied	Unoccupied
Station Building 5	Occupied	Occupied

Building ID ²	2016 Occupancy Status ³	2025 Occupancy Status
Station Building 6	Unoccupied	Unoccupied
Station Building 7	Occupied	Unoccupied
Station Building 8	Unoccupied	Unoccupied
Station Building 9	Unoccupied	Unoccupied
Station Building 10	Occupied	Occupied
Station Building 11	Unoccupied	Unoccupied
Station Building 12	Unoccupied	Unoccupied
Station Building 13	Unoccupied	Unoccupied
Station Building 14	Unoccupied	Unoccupied
WWRF Buildings 1 thru 21 ⁴	Occupied	Occupied
<p><u>Notes:</u></p> <ol style="list-style-type: none"> Buildings are considered “occupied” if at least one human occupant is present in the building for at least 12 hours per day. For Site Building Occupancy Map, see Appendix A. 2016 building occupancy status is per the East and West Ash Ponds’ initial federal hazard potential classification assessment (Ref. 5). For the purposes of this assessment, it has been conservatively assumed that all 21 buildings identified at the WWRF are occupied. 		

5.2.3 CHANGES IN ASH POND GEOMETRY

Based on reviews of the annual inspection reports (Refs. 14 through 21) and Google Earth aerial images (Ref. 12), there have been no significant physical modifications to the East and West Ash Ponds (mass excavations, major embankment modifications, *etc.*) since the initial federal hazard potential classification assessment was completed. It should be noted that the lowering of the East Ash Pond’s eastern dike in the fall of 2016, as noted in the 2017 annual inspection report (Ref. 14), was incorporated into the initial federal hazard potential classification assessment and 2016 dike breach analysis.

5.2.4 CHANGES IN SITE TOPOGRAPHY

When comparing the 2007 USGS topography (Ref. 10) used in the initial federal hazard potential classification assessment and the 2017 ISGS elevation dataset for the area (Ref. 11), no significant

differences in the topography adjacent to the ash ponds and within the dike breach impact areas were identified. Moreover, Google Earth aerial images (Ref. 12) indicated that there have been no significant modifications to the ground surfaces (mass excavations, mass fill placement, *etc.*) adjacent to the East and West Ash Ponds or within the dike breach impact areas since 2007.

5.2.5 CHANGES IN USBR DEPTH-VELOCITY FLOOD DANGER LEVELS

To determine whether a failure at the East Ash Pond or West Ash Pond would cause a probable loss of human life, the 2016 dike breach analyses compared the combination of estimated flood velocity and depth at each occupied building to the U.S. Department of the Interior, Bureau of Reclamation's (USBR) depth-velocity flood danger level relationship presented in the bureau's "Downstream Hazard Classification Guidelines" (Ref. 23). The USBR states therein that if the depth-velocity combination of a hazard (*e.g.*, flood) for a given area plots within the "Low Danger Zone," "the number of lives-in-jeopardy associated with possible downstream hazards is assumed to be zero." In other words, floods plotting within the USBR's "Low Danger Zone" are unlikely to cause a probable loss of human life.

The USBR has not updated the depth-velocity flood danger level relationships presented in its "Downstream Hazard Classification Guidelines" (Ref. 23) since the initial federal hazard potential classification assessment for the East and West Ash Ponds was completed in 2016. Therefore, the depth-velocity danger level relationship used in the 2016 assessment remains valid for use in this 2025 assessment for determining the corresponding danger levels at occupied Station and WWRf buildings within the inundation areas downstream of the northern and southern dikes for the East and West Ash Ponds.

5.3 2025 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Per the evaluation of the key hazard potential classification criteria for the East and West Ash Ponds in Section 5.2, there have been significant operational changes made at the Station since the initial federal hazard potential classification assessment was completed in 2016. The Station's decommissioning efforts subsequent to the retirement of Units 7 and 8 in June 2022 have reduced the number of occupied buildings at the Station to two and limit the maximum operating water level in the East and West Ash Ponds to approximately 1 foot. Although no significant changes were noted to the other bases used to determine the ponds' initial federal hazard potential classifications (topography, downstream developments, depth-velocity flood danger level relationships), the Station's reduction in the East and West Ash Pond' storage capacities consequently reduces the potential impacts to downstream areas during a hypothetical dike breach. This warrants updating the hypothetical dike breach analyses for both ponds' northern and southern dikes.

5.3.1 UPDATED DIKE BREACH ANALYSIS METHODOLOGY

Consistent with the initial dike breach analyses conducted in 2016, hypothetical dike breaches at the East and West Ash Ponds' northern and southern dikes were evaluated under the ponds' current operating conditions to assess potential impacts to the Station and WWRF buildings downstream of the ponds. These assessments were performed independent of potential causes and/or apparent dike stability. As noted in Section 5.2.1 the only water entering the East and West Ash Ponds is direct precipitation and run-off from the crests of the ponds' dikes, and the opened Recycle Water Sump drain gates limit the normal operating water level in the ponds to approximately 1 foot. Therefore, the assumed water level in both ponds at the time of a hypothetical failure was taken as 2.6 feet, which is the sum of the normal water level (1 foot) plus the maximum PMP depth listed in Table 2-2 (19 inches). Finally, consistent with the 2016 dike breach analyses, it was assumed that a hypothetical failure at either pond's southern dike occurred concurrently with the peak flow of stormwater within the unnamed channel south of the pond during the probable maximum flood (PMF) event for the drainage area.

HEC-HMS modeling software was used to compute the PMF hydrographs using the NRCS CN Method for the drainage area under the four quartile PMP estimates listed in Table 2-2. Based on the modeling results, the First Quartile (6-hour storm) produced the highest peak flow and was subsequently used for downstream routing analysis and inundation mapping. The corresponding inundation maps for hypothetical failures at the East and West Ash Ponds' northern and southern dikes (four total scenarios) were developed using the HEC-RAS Version 6.4.1 software. Model terrain was based on the aforementioned 2017 ISGS topographic data (Ref. 11).

5.3.2 RESULTS FROM UPDATED SOUTHERN DIKE BREACH ANALYSES

Figure 5-1 and Figure 5-2 below show the maximum flow depth and maximum flow velocity, respectively, from a hypothetical breach at the East Ash Pond's southern dike. Table 5-2 presents a comparison of the maximum flow depths and velocities from this scenario as calculated under 2016 and 2025 operating conditions. Comparing the 2016 and 2025 results, the maximum flow velocities from a hypothetical breach at the East Ash Pond's southern dike are significantly reduced. The reductions range from 51.4% to 90.6%, with an average reduction in maximum flow velocity of 78.3%.

Figure 5-1 – Maximum Flow Depth from Breach at East Ash Pond South Dike

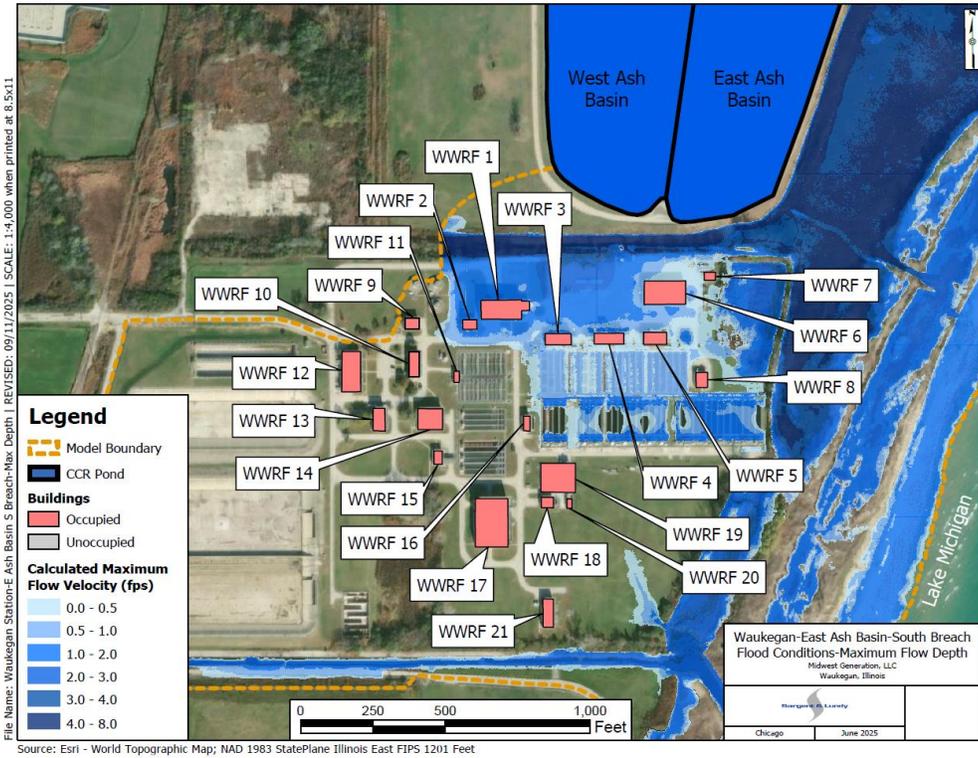
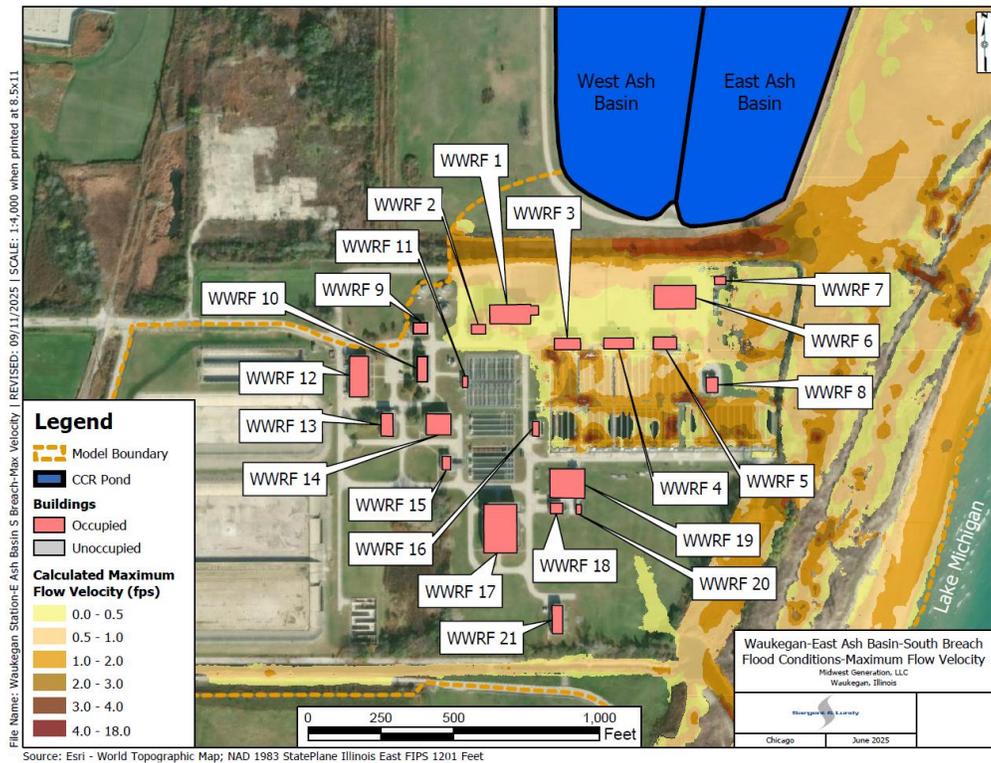


Figure 5-2 – Maximum Flow Velocity from Breach at East Ash Pond South Dike



**Table 5-2 – Comparison of Maximum Flood Characteristics Near WWRF Buildings:
East Ash Pond, South Dike**

Building ID	2016 Dike Breach Analysis		2025 Dike Breach Analysis	
	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)
WWRF 1	1.7	2.5	2.0	0.7
WWRF 2	0.8	3.1	1.6	0.9
WWRF 3	1.4	3.5	1.4	1.7
WWRF 4	1.1	4.1	1.2	0.6
WWRF 5	1.1	3.1	1.2	0.5
WWRF 6	1.5	4.0	0.9	0.7
WWRF 7	1.6	3.2	0.2	0.3
WWRF 8	0.5	1.0	0.1	0.1
Maximum Reduction in Estimated Max. Flow Velocity:				90.6%
Minimum Reduction in Estimated Max. Flow Velocity:				51.4%
Average Reduction in Estimated Max. Flow Velocity:				78.3%

Figure 5-3 and Figure 5-4 below show the maximum flow depth and maximum flow velocity, respectively, from a hypothetical breach at the West Ash Pond’s southern dike. Table 5-3 presents a comparison of the maximum flow depths and velocities from this scenario as calculated under 2016 and 2025 operating conditions. As was observed for the East Ash Pond, the maximum flow velocities from a hypothetical breach at the West Ash Pond’s southern dike are significantly reduced under current operating conditions compared to 2016 operating conditions. At the seven WWRF buildings that could be impacted under this scenario, the reductions range from 55.8% to 92.9%, with an average reduction in maximum flow velocity of 80.9%. Moreover, WWRF Buildings 9, 10, 12, 13, and 14 are no longer within the inundation area resulting from a hypothetical breach at the West Ash Pond’s southern dike.

Figure 5-3 – Maximum Flow Depth from Breach at West Ash Pond South Dike

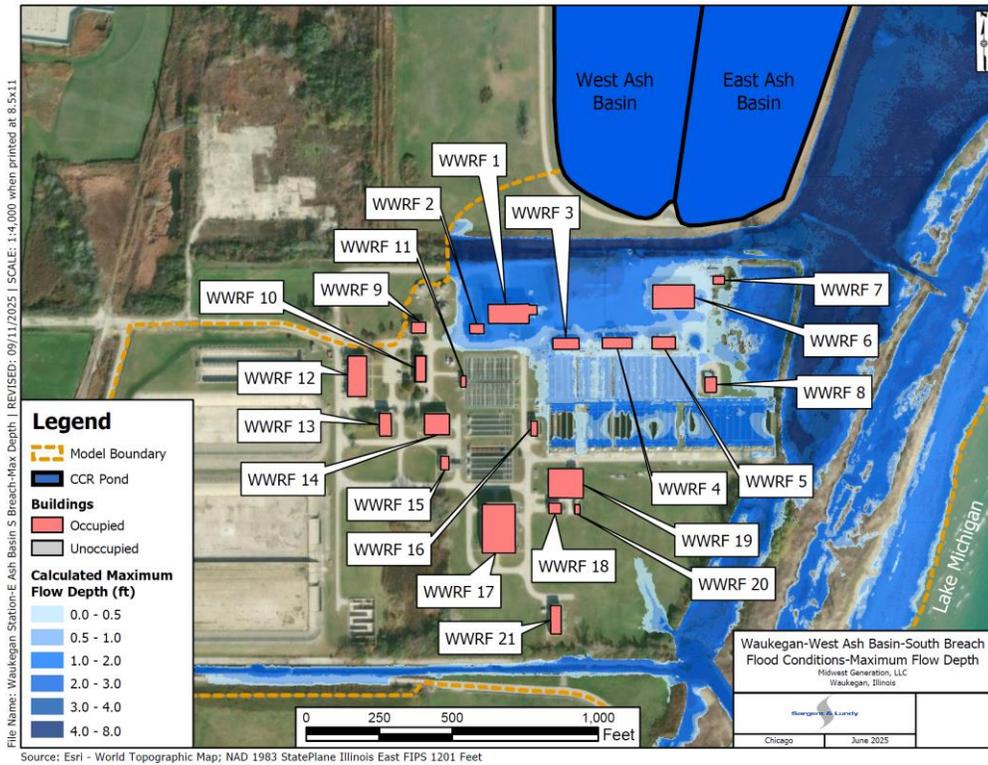
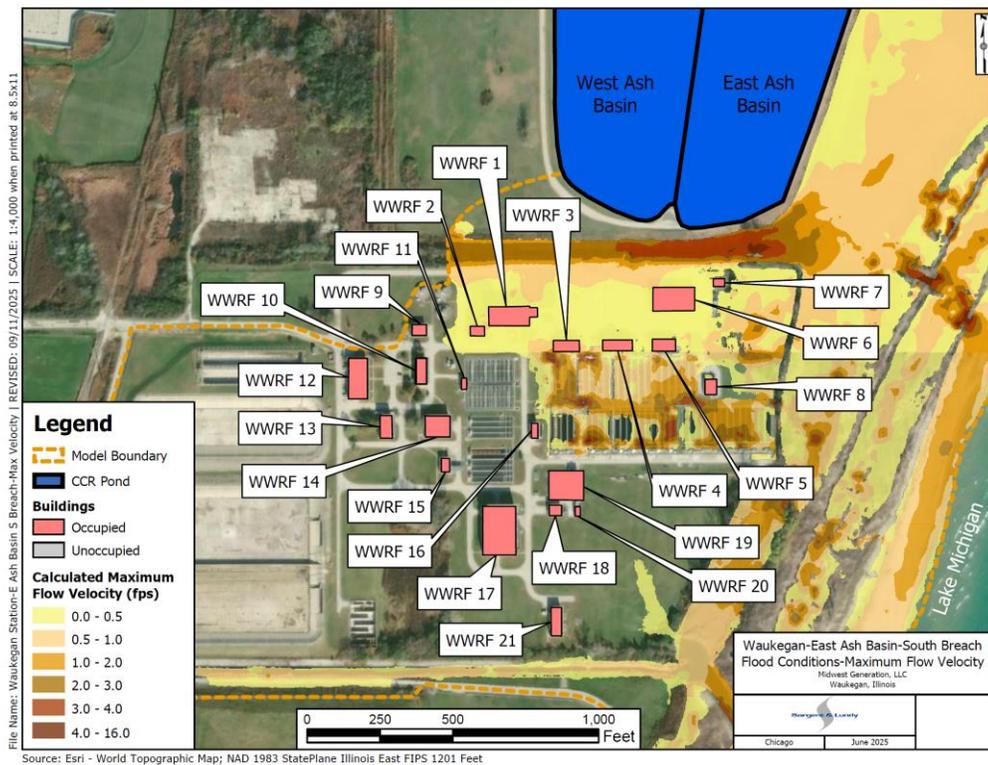


Figure 5-4 – Maximum Flow Velocity from Breach at West Ash Pond South Dike



**Table 5-3 – Comparison of Maximum Flood Characteristics Near WWRF Buildings:
West Ash Pond, South Dike**

Building ID	2016 Dike Breach Analysis		2025 Dike Breach Analysis	
	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)
WWRF 1	2.1	3.0	2.1	0.7
WWRF 2	1.2	3.3	1.6	0.9
WWRF 3	1.6	4.3	1.5	1.9
WWRF 4	1.4	5.2	1.2	0.7
WWRF 5	1.4	4.1	1.3	0.5
WWRF 6	2.2	4.2	0.9	0.7
WWRF 7	1.6	3.4	0.2	0.3
WWRF 8	0.8	1.4	0.2	0.1
WWRF 9	0.1	0.1	--	--
WWRF 10	0.2	0.2	--	--
WWRF 12	0.5	0.9	--	--
WWRF 13	0.2	0.1	--	--
WWRF 14	0.1	0.1	--	--
Maximum Reduction in Estimated Max. Flow Velocity:				92.9%
Minimum Reduction in Estimated Max. Flow Velocity:				55.8%
Average Reduction in Estimated Max. Flow Velocity:				80.9%

5.3.3 RESULTS FROM UPDATED NORTHERN DIKE BREACH ANALYSES

Figure 5-5 and Figure 5-6 below show the maximum flow depth and maximum flow velocity, respectively, from a hypothetical breach at the East Ash Pond's northern dike. Table 5-4 presents a comparison of the maximum flow depths and velocities from this scenario as calculated under 2016 and 2025 operating conditions. Comparing the 2016 and 2025 results, substantial reductions are observed in the maximum flow velocities observed near Station Buildings 1 through 6 under this scenario. The reductions range from 77.3% to 97.0%, with an average reduction in maximum flow velocity of 89.4%. Moreover, the breach inundation area has reduced. Under the pond's operating conditions in 2016, water released from the East Ash Pond's northern dike extended up near the switchyard and into the northwest corner of the Station's property. This is not the case under current operating conditions where substantially less water is stored in the pond.

Figure 5-5 – Maximum Flow Depth from Breach at East Ash Pond North Dike

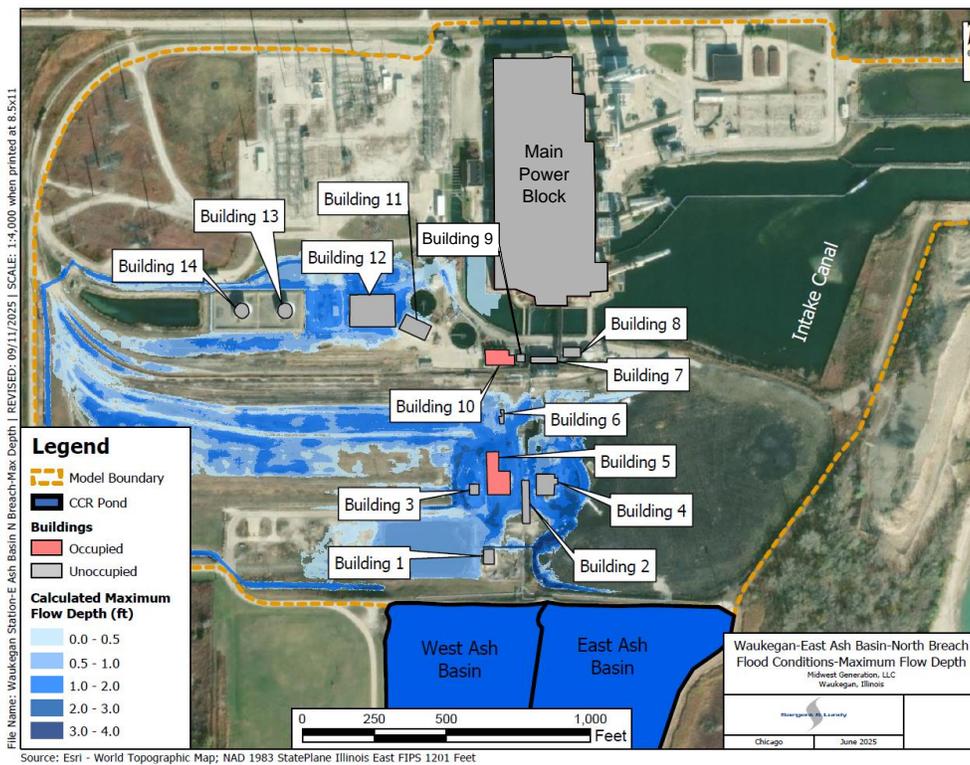


Figure 5-6 – Maximum Flow Velocity from Breach at East Ash Pond North Dike

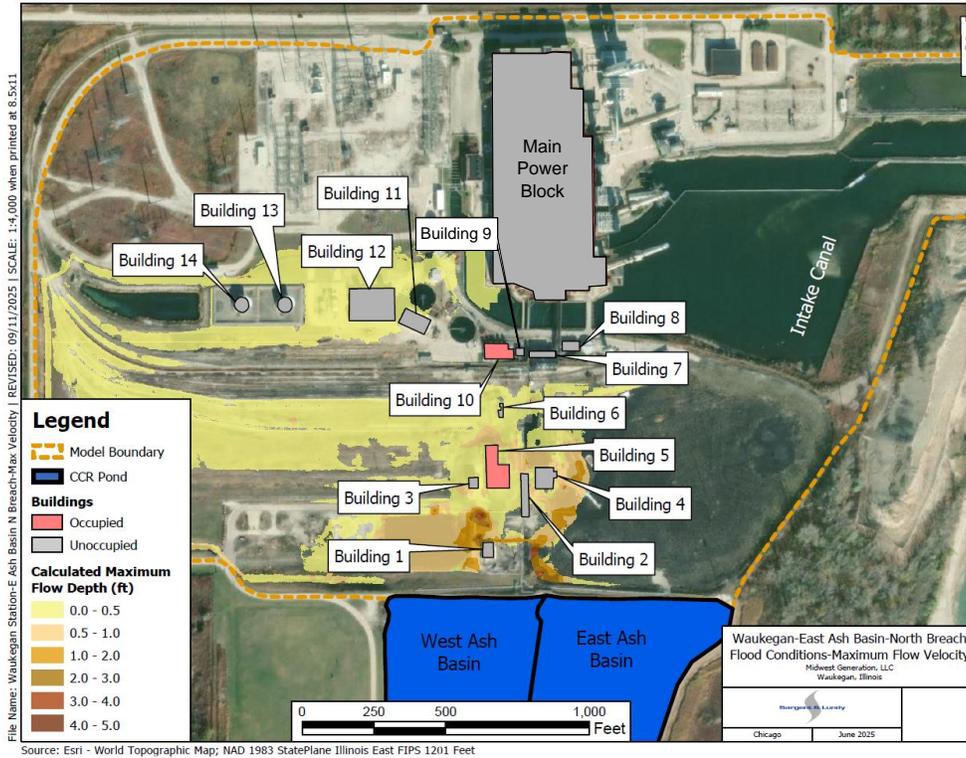


Table 5-4 – Comparison of Maximum Flood Characteristics Near Station Buildings: East Ash Pond, North Dike

Building ID	2016 Dike Breach Analysis		2025 Dike Breach Analysis	
	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)
Building 1 (Unoccupied)	1.3	6.2	1.1	0.5
Building 2 (Unoccupied)	2.6	5.2	1.9	0.6
Building 3 (Unoccupied)	2.0	2.2	1.6	0.5
Building 4 (Unoccupied)	2.8	7.4	1.8	0.8
Building 5 (Occupied)	2.2	5.1	1.8	0.6
Building 6 (Unoccupied)	2.0	3.8	1.1	0.4
Building 10 (Occupied)	--	--	--	--

Building ID	2016 Dike Breach Analysis		2025 Dike Breach Analysis	
	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)
Building 11 (Unoccupied)	1.7	3.3	0.5	0.1
Building 12 (Unoccupied)	1.7	3.3	1.4	0.2
Building 13 (Unoccupied)	--	--	--	--
Building 14 (Unoccupied)	0.9	2.2	--	--
Maximum Reduction in Estimated Max. Flow Velocity:				97.0%
Minimum Reduction in Estimated Max. Flow Velocity:				77.3%
Average Reduction in Estimated Max. Flow Velocity:				89.4%

Figure 5-7 and Figure 5-8 below show the maximum flow depth and maximum flow velocity, respectively, from a hypothetical breach at the West Ash Pond’s northern dike. Table 5-5 presents a comparison of the maximum flow depths and velocities from this scenario as calculated under 2016 and 2025 operating conditions. As was observed for the East Ash Pond, the maximum flow velocities from a hypothetical breach at the West Ash Pond’s northern dike are significantly reduced under current operating conditions compared to 2016 operating conditions. The reductions range from 11.9% to 94.3%, with an average reduction in maximum flow velocity of 78.5%. If Station Building 1, which is immediately downstream of the West Ash Pond, is excluded, the minimum reduction in maximum flow velocity is 81.3%. In addition, the breach inundation area under the pond’s current operating conditions is smaller than under its 2016 operating conditions. In the 2016 dike breach analysis, water released from the West Ash Pond’s northern dike was found to extend up near the switchyard and into the northwest corner of the Station’s property; this is not the case under current operating conditions where significantly less water is stored in the pond.

Figure 5-7 – Maximum Flow Depth from Breach at West Ash Pond North Dike

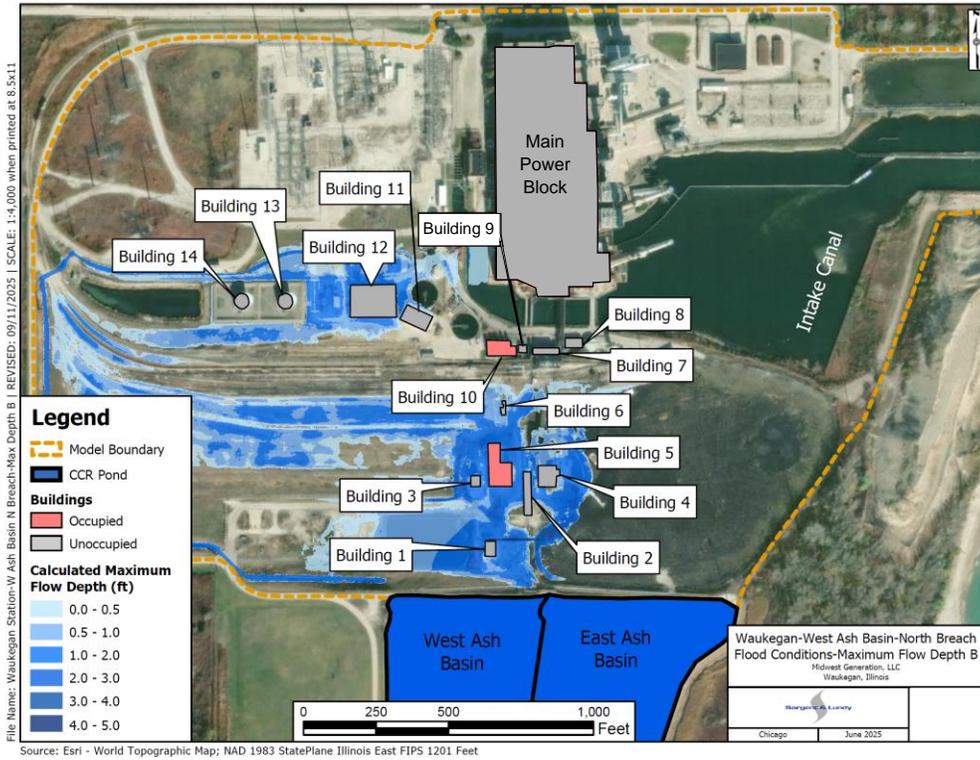
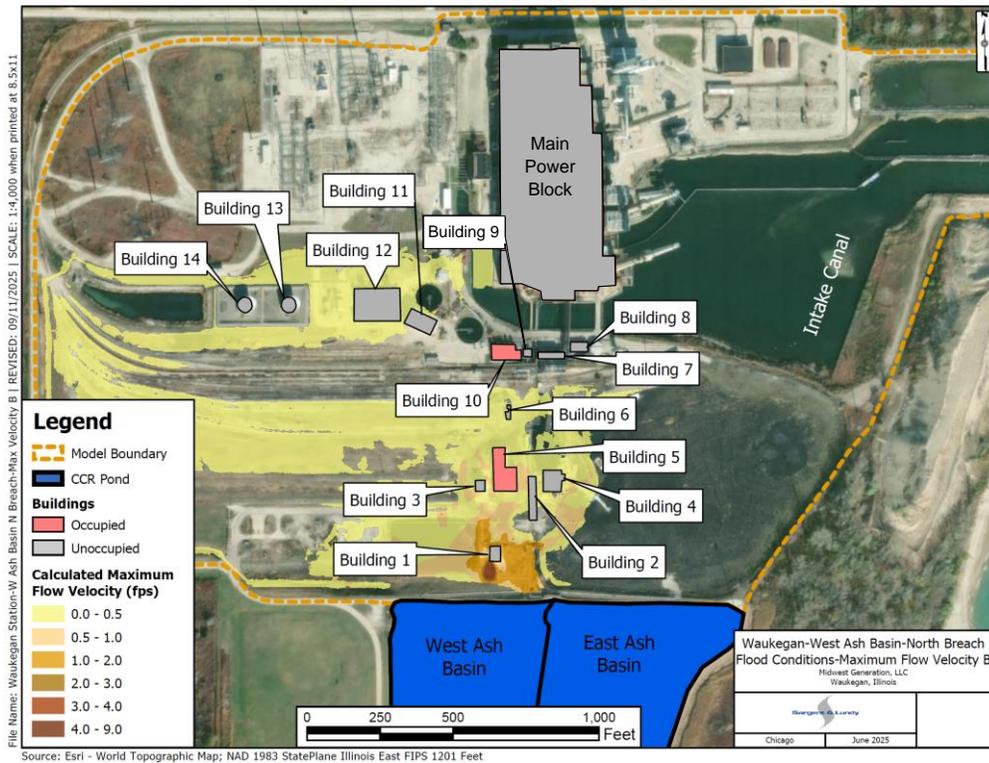


Figure 5-8 – Maximum Flow Velocity from Breach at West Ash Pond North Dike



**Table 5-5 – Comparison of Maximum Flood Characteristics Near Station Buildings:
 West Ash Pond, North Dike**

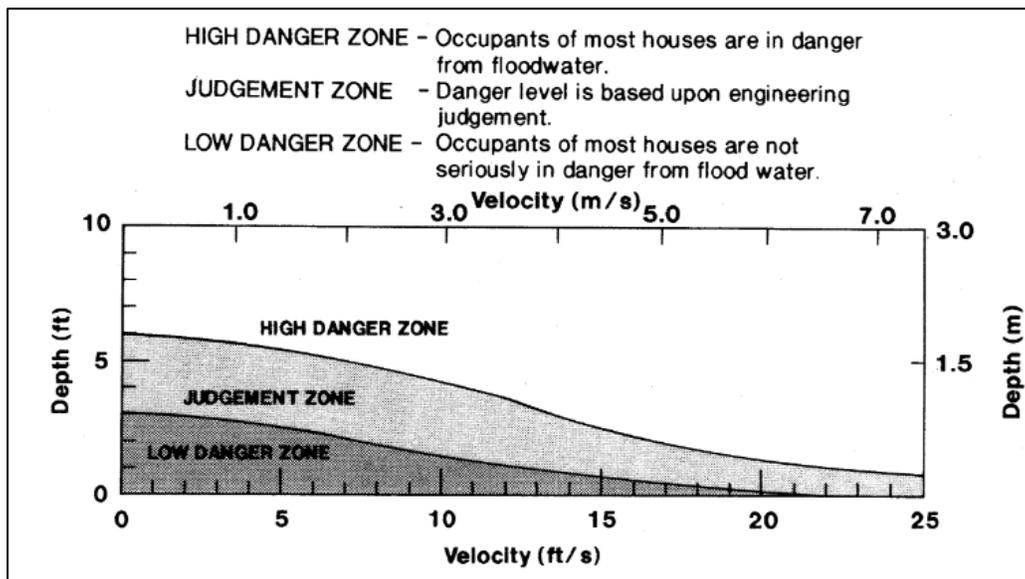
Building ID	2016 Dike Breach Analysis		2025 Dike Breach Analysis	
	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)	Estimated Max. Flow Depth (ft)	Estimated Max. Flow Velocity (fps)
Building 1 (Unoccupied)	3.2	4.2	1.6	3.7
Building 2 (Unoccupied)	2.5	5.0	1.6	0.7
Building 3 (Unoccupied)	2.4	4.4	1.5	0.5
Building 4 (Unoccupied)	2.7	3.2	1.6	0.6
Building 5 (Occupied)	2.5	4.6	1.7	0.6
Building 6 (Unoccupied)	2.5	3.4	1.1	0.4
Building 10 (Occupied)	0.4	1.0	--	--
Building 11 (Unoccupied)	2.0	3.5	1.0	0.2
Building 12 (Unoccupied)	2.0	3.3	1.9	0.3
Building 13 (Unoccupied)	0.3	0.3	--	--
Building 14 (Unoccupied)	1.6	3.1	--	--
Maximum Reduction in Estimated Max. Flow Velocity:				94.3%
Minimum Reduction in Estimated Max. Flow Velocity:				11.9%
Average Reduction in Estimated Max. Flow Velocity:				78.5%

5.3.4 FLOOD-DEPTH VELOCITY DANGER ZONE

Per the results from the updated dike breach analyses presented in Sections 5.3.2 and 5.3.3, the maximum flood depth is not expected to exceed 2.1 feet at any occupied building at the Station or the WWRF from a hypothetical release at either ash pond. Moreover, the maximum flow velocity is not expected to exceed 1.9

feet per second at any occupied building. Based on the USBR's flood depth-velocity danger zones reproduced in Figure 5-9, conservatively combining these two maxima would result in a flood depth-velocity combination that plots within the "Low Danger Zone." Therefore, all of the flood depth-velocity combinations calculated in the updated dike breach analyses for the East and West Ash Ponds will plot within the "Low Danger Zone," thereby indicating that a failure at either of the ponds' northern or southern dikes would not result in a probable loss of human life at the occupied Station and WWRF buildings.

Figure 5-9 – USBR Flood Depth-Velocity Danger Zones (from Ref. 24, Figure 2)



5.3.5 HAZARD POTENTIAL CLASSIFICATIONS

Under the Illinois CCR Rule, the primary consideration for classifying the hazard potential for a CCR surface impoundment is whether the downstream impacts from a hypothetical breach at the impoundment would cause a probable loss of human life. Per Table 2-1, loss of human life is the critical aspect of the Class 1 hazard potential classification. If a loss of human life is unlikely to occur, then the CCR surface impoundment is not a Class 1 hazard potential; instead, it is a Class 2 hazard potential.

Because a hypothetical failure at either pond will not cause a probable loss of human life, both the East and West Ash Ponds are classified as Class 2 CCR surface impoundments under their current operating conditions pursuant to 35 Ill. Adm. Code 845.440(a)(1). These classifications are not reflections of the potential for the impoundments to fail. The 2025 annual safety factor assessment conducted pursuant to 35 Ill. Adm. Code 845.460 (Ref. 4) shows that the East and West Ash Ponds are stable under design operating conditions. Moreover, no visual signs of distress that could be indicative of dike instability were observed

during the August 28, 2025, condition assessment performed by S&L in support of the ponds' 2025 annual structural stability assessment under 35 Ill. Adm. Code 845.450 (Ref. 3).

6.0 CONCLUSIONS

This assessment re-evaluated the factors and design inputs used as the bases for the initial federal hazard potential classification assessment completed in 2016 in accordance with the Federal CCR Rule for Waukegan's East and West Ash Ponds. It was determined that no significant physical changes to these CCR surface impoundments and no new downstream developments within the dike breach inundation areas have occurred within the last nine years that would necessitate changing either pond's initial federal hazard potential classification. However, operational changes made by the Station since Units 7 and 8 were retired in June 2022 have reduced the ponds' operating capacities to volumes substantially less than their original design capacities, warranting a re-evaluation of the potential impacts to downstream areas during hypothetical dike breaches at the ponds' north and south dikes.

Based on the results from dike breach analyses for the East and West Ash Ponds, a loss of human life is unlikely to result from a hypothetical failure at either pond under the ponds' current operating conditions. Under the Illinois CCR Rule, the primary consideration for classifying the hazard potential for a CCR surface impoundment is whether the downstream impacts from a hypothetical breach at the impoundment would cause a probable loss of human life. If a loss of human life is likely to occur, then the CCR surface impoundment is a Class 1 hazard potential; otherwise, it is a Class 2 hazard potential. Because a hypothetical failure at either pond will not cause a probable loss of human life, both the East and West Ash Ponds are classified as Class 2 CCR surface impoundments under their current operating conditions pursuant to 35 Ill. Adm. Code 845.440(a)(1).

Table 6-1 presents the 2025 hazard potential classifications assigned to the Waukegan East and West Ash Ponds under their current operating conditions in accordance with 35 Ill. Adm. Code 845.440(a)(1).

Table 6-1 – 2025 Illinois Hazard Potential Classifications for East Ash Pond & West Ash Pond at the Waukegan Generating Station

CCR Surface Impoundment	2025 Illinois Hazard Potential Classification
East Ash Pond	Class 2
West Ash Pond	Class 2

However, as noted above, the 2025 hazard potential classifications for the East and West Ash Ponds do not reflect the probability of a hypothetical failure event associated with the ponds and are not contingent upon

the ponds' structural stabilities. Indeed, the 2025 annual safety factor assessment conducted pursuant to 35 Ill. Adm. Code 845.460 (Ref. 4) shows that the East and West Ash Ponds are structurally stable under design operating conditions. Moreover, no visual signs of distress that could be indicative of dike instability were observed during S&L's August 28, 2025, condition assessment performed in support of the ponds' 2025 annual structural stability assessment under 35 Ill. Adm. Code 845.450 (Ref. 3).

7.0 CERTIFICATION

I certify that:

- This hazard potential classification assessment was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.440.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: Thomas Dehlin

Date: October 13, 2025

Seal:



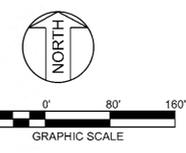
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APPENDIX A: SITE BUILDING OCCUPANCY MAP

PRELIMINARY
NOT FOR CONSTRUCTION



LEGEND

	OCCUPIED BUILDING
	UNOCCUPIED BUILDING

- NOTES**
- AERIAL IMAGE IS FROM GOOGLE EARTH PRO V7.3 AND MAY NOT BE REPRESENTATIVE OF CURRENT SITE CONDITIONS.
 - BUILDING NUMBERS ARE FOR REFERENCE PURPOSES ONLY AND MAY NOT CORRESPOND TO THE BUILDING NAMES OR NUMBERS ASSIGNED BY / USED AT THE STATION OR THE NORTH SHORE WATER RECLAMATION DISTRICT.
 - BUILDINGS ARE CONSIDERED TO BE OCCUPIED IF AT LEAST ONE HUMAN OCCUPANT IS PRESENT IN THE BUILDING FOR AT LEAST 12 HOURS PER DAY.

REFERENCE DRAWINGS

CONTRACTOR/INSTALLER SHALL TAKE ALL APPROPRIATE PRECAUTIONS TO ENSURE THE SAFETY OF ALL PEOPLE LOCATED ON THE WORK SITE, INCLUDING CONTRACTOR'S/INSTALLER'S PERSONNEL (OR THAT OF ITS SUBCONTRACTOR(S)) PERFORMING THE WORK.

UNDERGROUND OR EMBEDDED UTILITIES MAY BE LOCATED WITHIN OR ADJACENT TO THE AREA IN WHICH EXCAVATION, DEMOLITION, FOUNDATION, OR MODIFICATION WORK IS TO BE PERFORMED.

REFERENCES RELATING TO THE UNDERGROUND OR EMBEDDED UTILITIES ARE PROVIDED TO ASSIST THE CONTRACTOR/INSTALLER IN THE FIELD LOCATING THOSE UTILITIES AND OTHER POSSIBLE UNDERGROUND OR EMBEDDED INTERFERENCES WITH THE WORK.

THE CONTRACTOR/INSTALLER SHALL EXERCISE DUE CAUTION DURING ALL EXCAVATION/FOUNDATION/DEMOLITION WORK.

HOLD INFORMATION	
NO.	DESCRIPTION

CONTRACTOR/INSTALLER SHALL TAKE ALL APPROPRIATE PRECAUTIONS TO ENSURE THE SAFETY OF ALL PEOPLE LOCATED ON THE WORK SITE, INCLUDING CONTRACTOR'S/INSTALLER'S PERSONNEL (OR THAT OF ITS SUB-CONTRACTOR(S)) PERFORMING THE WORK.

RELEASE INFORMATION

REV.	DATE	DESCRIPTION
0	10-10-2024	FOR USE

ISSUE PURPOSE: USE
SPECIFICATION: N/A
PROJECT NO.: 12661-187

CAD FILE NAME: WC-EXHIBIT-CSK-002.DGN
PREPARED BY: S. MORALES / J. CHAVEZ
REVIEWED BY: T. DEHLIN
APPROVED BY: ---

ANY MODIFICATION OR ADDITION TO THIS DRAWING BY AN ORGANIZATION OTHER THAN SARGENT & LUNDY, IS NOT THE RESPONSIBILITY OF SARGENT & LUNDY.



PROJECT

WAUKEGAN GENERATING STATION
2024 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

DRAWING TITLE

SITE BUILDING OCCUPANCY MAP

DRAWING NUMBER	REVISION
12661-187-WK-CSK-001	0

SHEET 1 OF 1

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Form: GDC-CAD-1-01-06_ANSI (Imperial) Microstation Border - Size E - 34 x 44
Revision: 11A, Revision Date: 04-30-2010

10/10/2024 4:19:00 PM
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