

**ANNUAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT REPORT
ASH PONDS 1N AND 1S - WILL COUNTY STATION
SEPTEMBER 2025**

This annual Hazard Potential Classification Assessment (HPCA) Report has been prepared pursuant to the coal combustion residuals (CCR) rule codified in Title 35 of the Illinois Administrative Code Section 845.440(a) for Ash Ponds 1N and 1S at Will County Station in Romeoville, Illinois (Station). The purpose of this project is to perform the annual hazard potential classification assessment by a licensed professional engineer to document the hazard potential classification as either a Class 1 or a Class 2 surface impoundment including the basis for the determination. The site is a former coal-fired power station owned and operated by Midwest Generation, LLC.

1.0 SUMMARY

In completing the 2025 HPCA, CEC reviewed the results of the previous HPCA reports, and the 2025 Annual Inspection Report for Ash Ponds 1N and 1S. The following sections provide a description of regulatory requirements, physical and operational features of the ponds. Based on the results of the analyses provided in this report, Ponds 1N and 1S are classified as a Class 2 CCR surface impoundment because their failure would not result in probable loss of life but could result in potential economic and environmental damages.

2.0 REGULATION REQUIREMENTS

According to Section 845.120 of the CCR regulations:

“Hazard potential classification” means 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 hazardous potential classifications include Class 1 and Class 2, 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 or other concerns.

3.0 SITE PLAN

Ponds 1N and 1S are located at Will County Station, 529 East 135th Street in Romeoville, Will County, Illinois and situated south of 135th Street between the Des Plaines River and the Chicago Sanitary and Ship Canal.

Basic information for the ponds is provided in Table 1. The ponds are of similar construction, size, and age. Each pond is constructed with a concrete weir spillway along the west half. Gravel access roads are located along the sides of the ponds.

Table 1: Ash Pond Construction

Pond ID	Year of Original Construction	Dimension (ft x ft)	Depth (ft)	Capacity (ft ³)	Status
Pond 1N	1977	167 x 333	7	520,000	Inactive
Pond 1S	1977	300 x 195	7	460,000	Inactive

4.0 HAZARD CLASSIFICATION ASSESSMENT

Our annual inspection showed no physical modifications to Ponds 1N and 1S or to the surrounding area and no distress that would affect the operation and/or stability. There have been no physical modifications or operational concerns that would change the results of the initial HPCA.

Based on the results of the annual inspection, review of the previous HPCA report, and the analysis provided in this report, Ponds 1N and 1S are classified as a Class 2 CCR impoundment because their failure would not result in probable loss of life but could result in impacts to the Des Plaines River creating potential economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

5.0 LIMITATIONS AND CERTIFICATIONS

This Hazard Potential Classification Assessment Report has been prepared pursuant to the CCR rule codified in Title 35 of the Illinois Administrative Code, Section 845.440(a) and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: September 17, 2025

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025