ANNUAL INSPECTION REPORT ASH PONDS 1N AND 1S WILL COUNTY STATION SEPTEMBER 2022

This annual inspection report has been prepared pursuant to the coal combustion residuals (CCR) rule codified in Title 35 of the Illinois Administrative Code, Section 845.540(b) for Ash Ponds 1N and 1S at Will County Station in Romeoville, Illinois (Station). The purpose of this project is to perform the annual inspection of Ash Ponds 1N and 1S by a licensed professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. Civil & Environmental Consultants, Inc. (CEC) completed the following scope of services in preparing this annual inspection report:

- CEC reviewed the weekly and monthly inspection reports completed by a qualified person employed by Midwest Generation, LLC.
- CEC performed the annual inspection in accordance with the requirements of Part 845.540 including observations pertaining to the following:
 - <u>Changes in Geometry</u>: Observations of changes in the geometry of Ash Ponds 1N and 1S.
 - <u>Instrumentation</u>: Inspection of the location and type of existing instrumentation and documentation of the maximum recorded readings of each instrument from records provided by Station personnel.
 - <u>Capacity and Impounded Volume</u>: Approximate minimum, maximum, and present depth and elevation of the impounded water and CCR; storage capacity of the impounding structure at the time of the inspection; and the approximate volume of the impounded water and CCR at the time of the inspection.
 - <u>Structural/Operational Observations</u>: Inspection for actual or potential structural weakness of the CCR surface impoundment, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR surface impoundment and appurtenant structures;
 - <u>Other Changes</u>: Inspection including change(s) which may have affected the stability or operation of the impounding structure.

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Ash Ponds 1N and 1S are closed surface impoundments, both less than 2 acres in size. On August 30, 2022, CEC inspected Ash Ponds 1N and 1S and our observations showed no signs of distress that would suggest the stability or operation of the impounding structures are compromised.

1.0 CHANGES IN GEOMETRY

At the time of inspection, Ash Ponds 1N and 1S geometry was observed to be unchanged from previous inspection.

2.0 INSTRUMENTATION

Based on our interview of Station personnel, which was confirmed through our inspection, Ash Ponds 1N and 1S have no instrumentation.

3.0 CAPACITY AND IMPOUNDED VOLUME

Capacity and impounded volume of Ash Ponds 1N and 1S and estimated depth of impounded water and CCR are represented in Table 1 and 2, attached. Volumes and depths were determined through discussion with station personnel and by reviewing inspection reports, construction drawings, and from modeling using existing topographic data.

4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS

Ash Ponds 1N and 1S were inspected for signs of distress that would have the potential to disrupt operation and safety of the basin. Prior to performing the initial inspection, discussions with statement personnel did not identify conditions that indicate an actual or potential structural weakness. Weekly and monthly inspection reports were also reviewed and did not indicate an actual or potential structural weakness.

5.0 OTHER CHANGES

Ash Ponds 1N and 1S were inspected for signs of other changes or distress that would have the potential to disrupt operation and safety of each basin. Our inspection showed no distresses that would affect the operation and/or stability of Ash Ponds 1N and 1S.

6.0 LIMITATIONS AND CERTIFICATION

This annual CCR annual inspection report was prepared to meet the requirements of Section 845.540(b) and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the

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correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.



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Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§845(b)(2)(A)	None	None
Instrumentation	§845(b)(2)(B)	None	None
Water Depth	§845(b)(2)(C)	Less than 1 foot	None
CCR Depth	§845(b)(2)(C)	7 feet	None
Estimated Storage Capacity	§845(b)(2)(D)	11.5 Acre Feet	None
Impounded Water Volume	§845(b)(2)(E)	0.0 Acre Feet	None
Impounded CCR Volume	§845(b)(2)(E)	11.5 Acre Feet	None
Structural/Operational Observations	§845(b)(2)(F)	None	None
Other Changes	§845(b)(2)(G)	None	None

Table 1: Inspection Summary - Ash Pond 1N

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§845(b)(2)(A)	None	None
Instrumentation	§845(b)(2)(B)	None	None
Water Depth	§845(b)(2)(C)	Less than 1 foot	None
CCR Depth	§845(b)(2)(C)	7 feet	None
Estimated Storage Capacity	§845(b)(2)(D)	10.5 Acre Feet	None
Impounded Water Volume	§845(b)(2)(E)	0.0 Acre Feet	None
Impounded CCR Volume	§845(b)(2)(E)	10.5 Acre Feet	None
Structural/Operational Observations	§845(b)(2)(F)	None	None
Other Changes	§845(b)(2)(G)	None	None

Table 2: Inspection Summary - Ash Pond 1S