October 30, 2026

VIA EMAIL: eric.kovatch@wecenergygroup.com

Mr. Eric Kovatch
WEC Energy Group – Business Services
333 West Everett Street, A231
Milwaukee, Wisconsin 53203

Re: 2026 Periodic Inflow Design Flood Control System Plan
Weston Units 3 & 4 Bottom Ash Basins
Wisconsin Public Service Corporation
Rothschild, Wisconsin

Dear Mr. Kovach:

This document has been prepared on behalf of Wisconsin Public Service Corporation (WPSC) to address the periodic inflow design flood control system plan requirements of Title 40 Code of Federal Regulations (40 CFR) §257.82(c)(4) for the Weston Units 3 & 4 Bottom Ash Basins at the Weston Generating Station in Rothschild, Wisconsin.

The previous periodic Inflow Design Flood Control System Plan was completed in October 2021. That plan evaluated the Bottom Ash Basins under their operating configuration and documented that the low-hazard-potential CCR surface impoundments had adequate capacity to collect and control the peak discharge associated with the 100-year inflow design flood without overtopping.

Since completion of the 2021 plan, operation and configuration of the Bottom Ash Basins have changed substantially. WPSC ceased sluicing bottom ash following modification of the Unit 3 bottom ash handling system in 2023. WPSC subsequently initiated permanent closure of the applicable CCR surface impoundments by removal in accordance with 40 CFR §257.102(c). Appendix A provides photos of the closure by removal activities in the Bottom Ash Basins.

Current Conditions and Closure Activities

Closure activities are currently underway and include dewatering and removal of CCR; removal of CCR-impacted materials; removal of liner system components; confirmation sampling of underlying materials; and regrading and restoring the former basin areas. The Northeast Secondary Basin is also being cleaned and reconstructed for use as a Process Pond for management of low-volume wastewater and stormwater following removal of CCR.

Closure construction began on April 6, 2026. Closure of the north and south primary basins was completed on July 6, 2026, followed by the northeast secondary basin on October 12, 2026. Closure of the southeast secondary basin is anticipated to be completed on or before December 8, 2026.

The closure construction documents require water to be managed throughout construction. During construction, one treatment train is maintained in continuous operation for management of low-volume wastewater, the basins are isolated as necessary to facilitate construction, and temporary water management is performed in accordance with the construction water management requirements.

Because the former CCR impoundments are undergoing removal and physical reconstruction, the basin geometry, contributing drainage areas, operating water levels, and hydraulic configuration evaluated in the October 2021 Inflow Design Flood Control System Plan no longer represent the conditions that will exist following completion of closure. Accordingly, repeating the hydraulic calculations from the 2021 operating configuration would not provide a representative evaluation of the units undergoing closure.

Inflow Design Flood Control During Closure

During the remaining closure activities, stormwater and other water entering the construction areas will continue to be actively managed to prevent uncontrolled accumulation of water and to facilitate removal of CCR and CCR-impacted materials. The construction specifications require the contractor to maintain pumping and drainage equipment, manage stormwater during excavation, and protect the site from flooding or running water.

These construction water-management measures replace reliance on the former normal operating configuration of the CCR surface impoundments as closure progresses. Conditions will continue to change as CCR, liner components, and portions of the former impoundment structures are removed and the areas are regraded.

Conclusion

WPSC is actively closing the Weston Units 3 & 4 Bottom Ash Basins by removal in accordance with 40 CFR §257.102(c). Closure construction is scheduled to be completed by December 31, 2026. During the remaining closure period, water within the affected areas will be managed through the construction water-management controls described above.

Accordingly, this periodic update documents the substantial change in conditions since the October 2021 Inflow Design Flood Control System Plan and the transition of the Bottom Ash Basins from operating CCR surface impoundments to units undergoing closure by removal. The October 2021 hydraulic analysis remains the most recent evaluation of the basins under their former operating configuration; however, those conditions are being eliminated through closure and therefore do not represent the configuration of the units during or following completion of closure.

Upon satisfaction of the closure-by-removal requirements of 40 CFR §257.102(c), including removal of CCR and affected materials and satisfaction of the applicable groundwater requirements, the CCR units will be considered closed by removal.

Professional Engineer Certification

I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch A-E 4, Wisconsin Administrative Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wisconsin Administrative code; and to the best of my knowledge, all information contained in this document is correct. I further certify that I am a qualified professional engineer as defined by 40 CFR Part 257 and that the Periodic Inflow Design Flood Control System Plan for the Weston Units 3 & 4 Bottom Ash Basins meets the requirements of 40 CFR § 257.82.



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If you have any questions, please contact John Trast at 920.455.8299.

Sincerely,

GEI Consultants, Inc.

Andrew Schwoerer, P.G.
Project Consultant

John M. Trast, P.E., D.GE
Vice President

Appendices

Appendix A Construction Photographs

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Appendix A Construction Photographs



Photo No. 1 – Closure by removal activities complete in the Primary Basin.



Photo No. 2 – Closure by removal activities complete in the Northeast Secondary Basin.