

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
Petition of Midwest Generation)	
for an Adjusted Standard from 845.740(a))	
and Finding of Inapplicability of Part 845)	AS 2021-001
(Joliet 29 Station))	
)	
)	

EXHIBIT LIST

MIDWEST GENERATION, LLC'S EXHIBITS	
Exhibit 1	Affidavit of William Naglosky
Exhibit 2	Affidavit of David Nielson, P.E.
Exhibit 3	Expert Opinion of David Nielson, P.E.
Exhibit 4	Pre-filed Expert Testimony of David Nielson on behalf of Midwest Generation, LLC. <i>In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845, PCB 20-19</i>
Exhibit 5	Excerpt of September 30, 2020 Hearing Transcript. <i>In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845, PCB 20-19</i>
Exhibit 6	Excerpt of Midwest Generation, LLC Pre-Filed Answers. <i>In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845, PCB 20-19</i>
Exhibit 7	Excerpt of Agency Final Comment. <i>In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845, PCB 20-19</i>
Exhibit 8	Excerpt of Midwest Generation, LLC's Response Comment. <i>In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845, PCB 20-19</i>
Exhibit 9	Excerpt of August 25, 2020 Hearing Transcript. <i>In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845, PCB 20-19</i>

MIDWEST GENERATION, LLC'S EXHIBITS	
Exhibit 10	NPDES Permit for the Joliet 29 Station
Exhibit 11	Annual and Quarterly Groundwater Monitoring Report, Joliet 29 Generating Station, Jan. 21, 2021
Exhibit 12	Joliet 29 Station General Flow Diagram with NPDES Outfalls
Exhibit 13	Illinois EPA Construction Permit for Liner Replacement of Ponds 1 and 2
Exhibit 14	Illinois EPA Construction Permit for Liner Replacement of Pond 3
Exhibit 15	Construction Documentation for Liner Replacement of Ponds 1 and 2
Exhibit 16	Construction Documentation for Liner Replacement of Ponds 3
Exhibit 17	Compliance Commitment Agreement for Joliet 29 Station
Exhibit 18	Joliet 29 CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020
Exhibit 19	Evaluation of Sediment Quantities in Joliet Generating Station's Pond 1 and Pond 3 and Powerton Generating Station's Service Water Basin, Nov. 19, 2020
Exhibit 20	Sampling Location Discussion as part of Evaluation of Sediment Quantities in Joliet Generating Station's Pond 1 and Pond 3 and Powerton Generating Station's Service Water Basin, Feb. 26, 2021
Exhibit 21	Notice of Intent to Initiate Closure Joliet 29 Station Pond 2
Exhibit 22	Supplemental Expert Opinion of Michael Maxwell (Weaver Consultants Group North Central, LLC), dated March 21, 2022
Exhibit 23	Affidavit of Richard Gnat, KPRG, March 18, 2022
Exhibit 24	Affidavit of Mark Wilson, KPRG, March 15, 2022
Exhibit 25	Expert Opinion of Mateusz Radlinski Ph.D. (Exponent, Inc.), March 21, 2022
Exhibit 26	Affidavit of Patrick Allenstein, March 9, 2022
Exhibit 27	Affidavit of Steven Kroll, Patrick Engineering, March 18, 2022

MIDWEST GENERATION, LLC'S EXHIBITS	
Exhibit 28	Expert Opinion of Thomas Dehlin (Sargent & Lundy), March 23, 2022
Exhibit 29	Example of Poz-o-pac
Exhibit 30	"Road salt retention and transport in soils and subsequent releases of toxic trace elements in porewaters", T. Baraza Piazuolo & E.A. Hasenmueller, St. Louis University, Copy of Poster
Exhibit 31	Large Copy of Exhibit D, Attachment 3, Appendix 2, Sheet 5079 C 5019 Sheet 2 of 3
Exhibit 32	Joliet 29 CCR Second Quarter 2021 Groundwater Sampling Results
Exhibit 33	Joliet 29 CCA Third Quarter 2021 Groundwater Sampling Results
Exhibit 34	Michael Maxwell CV
Exhibit 35	Thomas Dehlin CV
Exhibit 36	Koerner, R.M. (2005.) Designing with geosynthetics. 5th Ed. pp. 460–464.
Exhibit 37	Sangam, H.P. and Rowe, R.K. (2001.) "Migration of dilute aqueous organic pollutants through HDPE geomembranes." Geotextiles and Geomembranes. pp. 329 – 357
Exhibit 38	415 ILCS 5/3.135

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S EXHIBITS	
Exhibit A	Affidavit of Lauren Martin
Exhibit B	Affidavit of Derek Rompot
Exhibit C	Federal Highway Administration, "Coal Fly Ash User Guideline for Stabilized Base," User Guidelines for Waste and Byproduct Materials in Pavement Construction, Publication No. FHWA-RD-97-148, available at https://www.fhwa.dot.gov/publications/research/infrastructure/pavements/97-148-020.cfm (last modified March 8, 2016).

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S EXHIBITS

Exhibit D	Sargent & Lundy Letter to Illinois EPA re: 2008 Reconstruction of Access Ramp for Pond 2 at Joliet 29 Generating Station, with attachments, dated December 2, 2021.
Exhibit E	KPRG & Associates, Inc. Letter Report re: Geotechnical Analysis of Soil Surrounding Basins/Ponds, dated October 13, 2005.
Exhibit F	Federal Highway Administration, "Soils and Foundations Reference Manual – Volume 1," Publication No. FHWA-NHI-06-088 (December 2006).
Exhibit G	Sargent & Lundy Letter to Illinois EPA re: Construction Chronology of Pond 2 at Joliet 29 Generating Station, with attachments, dated January 18, 2022.
Exhibit H	Affidavit of Thomas Hubbard
Exhibit I	Patrick J. Fox et al., Technical Paper, Geomembrane Damage Due to Static and Cyclic Shearing Over Compacted Gravelly Sand, 18 Geosynthetics Int'l. 272 (2011).
Exhibit J	Ian D. Peggs, How Long Will My Liner Last? What is the Remaining Service Life of my HDPE Geomembrane?, Geosynthetics Mag. (October 1, 2008) available at https://geosyntheticsmagazine.com/2008/10/01/how-long-will-my-liner-last/ .
Exhibit K	MWG Weekly Inspection Report for Joliet 29 Station, October 13, 2021
Exhibit L	MWG Annual Inspection Report for Joliet 29 Station, October 13, 2021
Exhibit M	Nijman Franzetti, LLP letter to Illinois EPA, dated August 31, 2012
Exhibit N	USEPA Framework for Metals Risk Assessment, March 2007
Exhibit O	Part 845 MWG Joliet #29 Generating Station Q3 2021 Data Summary Posting