

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB; PRAIRIE RIVERS)
 NETWORK; NATIONAL ASSOCIATION)
 FOR THE ADVANCEMENT OF)
 COLORED PEOPLE,)
)
 Complainant(s),)
)
 v.)
)
 CITY OF SPRINGFIELD, OFFICE OF)
 PUBLIC UTILITIES d/b/a CITY)
 WATER, LIGHT & POWER)
)
 Respondent(s))

PCB 18-11
 (Enforcement- Water)

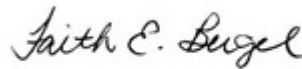
NOTICE OF FILING

To: Don Brown, Clerk
 Illinois Pollution Control Board
 100 West Randolph
 Suite 11-500
 Chicago, IL 60601

And Attached Service List

Please take note that on April 19, 2019, I filed electronically with the Office of the Clerk of the Illinois Pollution Control Board the attached Complainants' Unopposed Motion for Leave to File and the Amended Complaint, a copy of which is attached and served upon you.

Respectfully Submitted,



Faith E. Bugel
 1004 Mohawk
 Wilmette, IL 60091
 fbugel@gmail.com
 (312) 282-9119

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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Respondent(s))

**COMPLAINANTS' UNOPPOSED MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT**

NOW COME the Complainants, Sierra Club, Prairie Rivers Network, and National Association For The Advancement Of Colored People (“Complainants”), by and through counsel, and move the Illinois Pollution Control Board for leave to file the Amended Complaint attached hereto, and in support of their motion state as follows:

1. On September 27, 2017, Complainants filed a complaint alleging that City Water, Light & Power (CWLP), through coal ash ponds at site of its Dallman Station and former Lakeside Station site (“CWLP Site”), had caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405.

2. When Complainants filed their complaint, they had no reason to distinguish between the multiple groundwater monitoring wells at the CWLP Site, and so identified all known monitoring wells as identifying potential groundwater contamination by ash impoundments at the CWLP Site.

3. Since filing the complaint, through documents produced by CWLP in discovery, Complainants have become aware that two of the monitoring wells at the site, wells AP-4 and AP-5, are upstream of the ash impoundments, and therefore are not monitoring contamination from the ash impoundments identified in the original Complaint.

4. When Complainants filed their Complaint, they also had reason to believe that the permitted landfill was contributing to violations of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405.

5. Since filing the complaint, through documents produced by CWLP in discovery, Complainants have become aware that while the landfill may be causing unlawful groundwater contamination, this contamination and the regulations controlling discharges from the landfills are different in nature and scope from the contamination resulting from the other ash impoundments at the CWLP site.

6. As a result of the above recently acquired knowledge, the Amended Complaint seeks to clarify and simplify Complainants' legal claims, in an effort to secure timely resolution of this case. It is different from the original Complaint in only four narrow and interrelated respects:

- It removes references to exceedances of Illinois Class I and Class II Groundwater Standards that were detected at Monitoring Wells AP-4 and AP-5.
- It removes all claims relating to contamination that is exclusively from the permitted FGD Landfill.

- It supplements Complainants' previous list of monitored exceedances to reflect additional sampling and data Complainants have received in the course of discovery.
- It makes other small changes to clarify Complainants' claims in this case.

7. The fundamental contentions of the Complaint – that CWLP waste disposal practices for its coal ash and other coal combustion wastes have contaminated groundwater – remains unchanged. The Amended Complaint simply attempts to conform the pleadings to match the newly discovered facts of the case.

8. Complainants have previously discussed these changes with counsel for CWLP, and CWLP has not raised any objections to amending the Complaint as discussed.

9. Complainants also have previously discussed the impact of the filing of this Amended Complaint, and both parties have agreed that this filing need not impact the discovery schedule or any other deadlines in this case.

WHEREFORE, for all of the above-mentioned reasons, Complainants respectfully request leave to file the attached Amended Complaint.

Respectfully Submitted,

Faith E. Bugel

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COMPLAINANTS' FIRST AMENDED COMPLAINT

Complainants SIERRA CLUB, PRAIRIE RIVERS NETWORK, and NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (“Complainants”) complain of Respondent, CITY OF SPRINGFIELD, OFFICE OF PUBLIC UTILITIES d/b/a/ CITY WATER, LIGHT AND POWER (“Respondent”), as follows:

FACTUAL BACKGROUND

1. City of Springfield, Office of Public Utilities d/b/a/ City Water, Light & Power (CWLP), located in the City of Springfield, Illinois, owns and operates Dallman Station (“Dallman”), a coal-burning power plant located within city limits on Lake Springfield, in Sangamon County. CWLP used to also own and operate Lakeside Station, another coal-burning plant on the same site as Dallman, but that facility was decommissioned in 2009 (collectively “CWLP Site”). See 2010 Map of the CWLP Site Vicinity, attached hereto as Exhibit A.

2. CWLP has historically stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to, two ash ponds and a landfill; and it continues to store or dispose of coal ash and other coal combustion waste in these ponds or repositories. *See* 2010 Map of CWLP Site, attached hereto as Exhibit B. One of the two ash ponds, the Lakeside ash pond, received coal ash from the Lakeside Plant until it was decommissioned; since then, no additional coal ash or other coal combustion waste has been disposed of in that ash pond, though the onsite storage of such materials continues.

3. Since at least June 1, 2010, CWLP has sampled at least six groundwater monitoring wells (AP-1 through AP-5, and AW-3) around the CWLP Site ash impoundments and landfill, as depicted in the 2011 Map of CWLP Groundwater Monitoring Wells, attached hereto as Exhibit C. Since CWLP began monitoring in April of 2010, groundwater monitoring results have shown levels of arsenic, boron, iron, lead, manganese, sulfate, and total dissolved solids that exceed Illinois Groundwater Quality Standards (“GQSs”). *See* violations of Class I GQSs and groundwater monitoring data for CWLP Site, attached hereto as Exhibits D and violations of Class II GQSs and groundwater monitoring data for CWLP Site, attached hereto as Exhibits E.

PARTIES

4. Sierra Club is the nation’s oldest and largest grassroots environmental organization. Sierra Club is an incorporated, not-for-profit organization with headquarters located at 2101 Webster St., Ste. 1300, Oakland, CA, 94612. Sierra Club’s Illinois Chapter office is located at 70 E. Lake St., Suite 1500, Chicago, IL, 60601.

Sierra Club's mission is to preserve, protect, and enhance the natural environment. Sierra Club has 641,000 members, including approximately 23,000 members in Illinois.

5. Prairie Rivers Network ("PRN") is an Illinois non-profit organization that champions clean, healthy rivers and lakes and safe drinking water to benefit the people and wildlife of Illinois. Drawing upon sound science and working cooperatively with others, PRN advocates public policies and cultural values that sustain the ecological health and biological diversity of water resources and aquatic ecosystems.

6. The National Association for the Advancement of Colored People ("NAACP") is the nation's oldest and boldest civil rights organization in the world. NAACP is a not-for-profit organization and located at 4805 Mt. Hope, Drive, Baltimore, MD 21215. The mission of the National Association for the Advancement of Colored People (NAACP) is to ensure the political, educational, social, and economic equality of rights of all persons and to eliminate race-based discrimination. The NAACP's Environmental and Climate Justice Program works at addressing the many practices that are harming communities nationwide and worldwide and the policies needed to rectify these impacts and advance a society that fosters sustainable, cooperative, regenerative communities that uphold all rights for all people in harmony with the earth.

7. CWLP is the municipal electric and water utility for Springfield, Illinois. It is the largest municipally owned utility in the state of Illinois, and also owns and manages Lake Springfield, the primary source of drinking water for Springfield and one of Central Illinois' premier recreational resources. The utility provides Springfield with drinking water from Lake Springfield, and electric power from Dallman among other

sources. CWLP has its principal executive offices at 800 E. Monroe, 4th Floor Springfield, Illinois 62701.

THE GROUNDWATER CONTAMINANTS

8. As set forth in in detail in Exhibits D and E, groundwater monitoring results at the CWLP Site have exceeded Illinois Class I or II GQS, 35 Ill. Admin. Code §§ 620.410, 620.420, for the following contaminants: arsenic, boron, chromium, iron, lead, manganese, sulfate, and total dissolved solids (“TDS”).

9. Many of the contaminants found at elevated concentrations in the groundwater monitoring results at the CWLP Site are constituents of coal ash.¹

10. Boron is a primary indicator of potential coal ash impacts to groundwater.

11. The contaminants listed in this complaint, when present at the concentrations found in CWLP’s groundwater wells, make the groundwater unusable. Many of these contaminants are toxic and have been found at concentrations that present a human health risk. Others are dangerous to aquatic ecosystems; this is a significant concern to the extent that contaminated groundwater is migrating into adjacent surface water bodies.

12. Arsenic is known to cause multiple forms of cancer in humans and is also associated with non-cancer health effects of the skin and the nervous system.²

Groundwater that exceeds Illinois GQSs for arsenic is highly toxic; based on current U.S. EPA risk estimates, the cancer risk associated with drinking water at 0.05 mg/L, the

¹ See, e.g., U.S. EPA, Human and Ecological Risk Assessment of Coal Combustion Wastes at 2-4 (Draft, April 2010) (listing Coal Combustion Waste constituents), *available at* <http://earthjustice.org/sites/default/files/library/reports/epa-coal-combustion-waste-risk-assessment.pdf> (last visited Jun. 22, 2017).

² See, e.g., U.S. EPA, Integrated Risk Information System: Arsenic, inorganic, https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance_nmbr=278 (last visited June 22, 2017); U.S. Agency for Toxic Substances and Disease Registry (ATSDR), Toxicological Profile for Arsenic (Aug. 2007).

Illinois Class I GQS for arsenic, is greater than 2 in 1,000.³ The risk at 0.2 mg/L, the Class II GQS, is 1 in 100.

13. Oral exposure to boron has led to developmental and reproductive toxicity in multiple species. Specific effects include testicular degeneration, reduced sperm count, reduced birth weight, and birth defects.⁴ The EPA has established a child health advisory of 3 mg/L for boron, close to the Illinois Class I and Class II GQS of 2 mg/L.⁵

14. Chromium is an odorless and tasteless metallic element, and most commonly comes in two forms: trivalent chromium, and hexavalent chromium.⁶ Although some trivalent chromium is an important dietary element, hexavalent chromium is a known human carcinogen, and high levels of exposure through drinking water can cause oral ulcers, diarrhea, vomiting, and other signs of agitation.⁷ Since 1991, the U.S. EPA has enforced a federal drinking water standard of 0.1 mg/l, which is the same as the Illinois Class I standard; it determined that chromium should be regulated based on total chromium, including trivalent chromium, because the two forms of chromium can convert back and forth depending on conditions in the water or even inside the human body.⁸

³ Derived from U.S. EPA Integrated Risk Information System Chemical Assessment Survey: Arsenic, Inorganic, 14, *available at* https://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/0278_summary.pdf (listing a drinking water unit risk of 5E-5 per ug/L).

⁴ *See, e.g.*, U.S. EPA, Toxicological Profile of Boron and Compounds 60-61 (June 2004); U.S. EPA Integrated Risk Information System Chemical Assessment Survey: Boron and Compounds, *available at* https://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/0410_summary.pdf.

⁵ U.S. EPA, 2012 Edition of the Drinking Water Standards and Health Advisories (April, 2012).

⁶ U.S. EPA, Chromium in Drinking Water, <https://www.epa.gov/dwstandardsregulations/chromium-drinking-water> (last visited June 22, 2017).

⁷ U.S. EPA, Toxicological Review of Hexavalent Chromium 7 (Aug. 1998), *available at* https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/0144tr.pdf.

⁸ U.S. EPA, Chromium in Drinking Water, *supra* note 6.

15. Iron renders water unusable by imparting a rusty color and a metallic taste and causing sedimentation and staining; to prevent these effects the EPA has set a secondary drinking water regulation of 0.3 mg/L.⁹

16. Lead is known to be toxic to the nervous system, and is particularly associated with effects on childhood neurobehavioral development at very low doses. Lead is also classified by the EPA as a “probable human carcinogen.”¹⁰ The EPA Action Level for lead in drinking water is 0.015 mg/L.¹¹ This is unlikely to represent a “safe” level of exposure—the EPA has noted, for example, that there may be no threshold for lead toxicity.¹² Groundwater concentrations of lead above the Illinois Class I GQS, 0.0075 mg/L, are potentially unsafe in drinking water.

17. Manganese is also known to be toxic to the nervous system.¹³ The EPA has not updated its assessment of manganese toxicity in 16 years, so EPA standards and advisories may not reflect the latest scientific knowledge concerning effects on childhood neurological development,¹⁴ and the EPA Lifetime Health Advisory for manganese – 0.3 mg/L – may not be adequately health-protective. In any event, manganese concentrations greater than 0.05 mg/L render water non-potable by discoloring the water, giving it a

⁹ *Id.*

¹⁰ U.S. EPA, Integrated Risk Information System: Lead and Compounds (Inorganic), https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance_nmbr=277 (last visited June 22, 2017).

¹¹ U.S. EPA National Primary Drinking Water Regulations, Basic Information about Lead in Drinking Water, <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water> (last visited June 22, 2017).

¹² U.S. EPA Integrated Risk Information System Chemical Assessment Survey: Lead and Compounds (Inorganic), 2, *available at* https://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/0277_summary.pdf.

¹³ *See, e.g.*, U.S. EPA, Integrated Risk Information System: Manganese, https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance_nmbr=373 (last visited June 22, 2017).

¹⁴ *See, e.g.*, G.A. Wasserman et al., Water manganese exposure and children’s intellectual function in araihar, Bangladesh. 114 ENVIRON. HEALTH PERSP. 124 (2006).

metallic taste, and causing black staining.¹⁵ Groundwater with manganese above the Illinois Class I GQS – 0.15 mg/L – is unfit for human consumption and is potentially toxic.

18. High concentrations of sulfates in drinking water impart a salty taste and can cause diarrhea; to protect against these effects, the U.S. EPA has established a health-based advisory of 500 mg/L.¹⁶ Groundwater with sulfate concentrations above the Illinois Class I and Class II GQS of 400 mg/L is therefore unsuitable for human consumption.

19. Total Dissolved Solids (TDS) is a measure of multiple dissolved chemicals, and high TDS is generally associated with hardness, staining, salty taste, and deposits.¹⁷ Groundwater with TDS above the Illinois Class I and Class II GQS, 1,200 mg/L, is unsafe as drinking water.

20. Finally, many of the contaminants associated with coal ash bioaccumulate in aquatic ecosystems causing tissue damage and other effects in fish and amphibians. One review, for example, noted that “the combined effects of multiple accumulated elements may lead to numerous changes in individuals that could compromise individual fitness or health,” and provided several examples of coal ash-contaminated sites where the health of individuals and communities in aquatic ecosystems had been severely impaired.¹⁸

¹⁵ See U.S. EPA secondary drinking water regulations, <https://www.epa.gov/dwstandardsregulations/secondary-drinking-water-standards-guidance-nuisance-chemicals> (last visited June 22, 2017).

¹⁶ U.S. EPA, Drinking Water Advisory: Consumer Acceptability Advice and Health Effects Analysis on Sulfate (Feb. 2003).

¹⁷ See U.S. EPA secondary drinking water regulations, *supra* note 12.

¹⁸ C.L. Rowe et al., *Ecotoxicological implications of aquatic disposal of coal combustion residues in the United States: A review*, 80 ENVTL. MONITORING AND ASSESSMENT 207, 242 (2002); see also A.D. Lemly and J.P. Skorupa, Wildlife and the coal waste policy debate: Proposed rules or coal waste disposal ignore lessons from 45 years of wildlife poisoning, 46 ENVTL. SCI. TECH. 46 (2012).

LEGAL BACKGROUND

21. The Illinois Environmental Protection Act prohibits “the discharge of any contaminants into the environment . . . so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources,” 415 ILCS 5/12(a), and prohibits the deposition of “any contaminants upon the land in such place and manner so as to create a water pollution hazard.” 415 ILCS 5/12(d). “Water pollution” is defined as the “alteration” or “discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life.” 415 ILCS 5/3.545. “Waters” of the State is defined to include “all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State.” 415 ILCS 5/3.550.

22. Section 620.405 prohibits “the release of any contaminant to groundwater so as to cause a groundwater quality standard set forth in this Subpart to be exceeded.” 35 Ill. Admin. Code § 620.405. The Illinois Administrative Code establishes different groundwater quality standards for Class I and Class II groundwater.

23. Section 620.410 establishes Class I GQSs that cannot be exceeded in potable resource groundwater. 35 Ill. Admin. Code § 620.410. “Potable resource groundwater” is defined as:

Groundwater located 10 feet or more below the land surface and within:
(1) The minimum setback zone of a well which serves as a potable water supply and to the bottom of such well; (2) Unconsolidated sand, gravel or sand and gravel which is 5 feet or more in thickness and that contains 12

percent or less of fines . . . ; (3) Sandstone which is 10 feet or more in thickness, or fractured carbonate which is 15 feet or more in thickness; or (4) Any geologic material which is capable of a: (A) sustained groundwater yield, from up to a 12 inch borehole, of 150 gallons per day or more from a thickness of 15 feet or less; or (B) Hydraulic conductivity of 1×10^{-4} cm/sec or greater using one of the following test methods or its equivalent: (i) Permeameter; (ii) Slug test; or (iii) Pump test. 35 Ill. Admin. Code § 620.210(a).

24. The definition of Class I groundwater specifically excludes: Class III “special resource groundwater,” Class IV “other groundwater,” which includes groundwater in a zone of attenuation; and groundwater in a “groundwater management zone.” 35 Ill. Admin. Code § 620.210; *see also* 35 Ill. Admin. Code §§ 620.230, 620.240, 620.250. Section 620.115 provides that “No person shall cause, threaten or allow a violation of the Act, the [Illinois Groundwater Protection Act] or regulations adopted by the Board thereunder, including but not limited to this part.” 35 Ill. Admin. Code § 620.115. Section 620.301(a) provides that “No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: 1) Treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or 2) An existing or potential use of such groundwater is precluded.” 35 Ill. Admin. Code § 620.301.

25. Section 620.420 establishes Class II GQSs that cannot be exceeded in general resource groundwater. 35 Ill. Admin. Code § 620.420. “General resource groundwater” is defined as “groundwater which does not meet the provisions of . . . Class I . . . Class III . . . or . . . Class IV” and “groundwater which is found by the Board, pursuant to the petition procedures set forth in Section 620.260, to be capable of agricultural, industrial, recreational or other beneficial uses.” 35 Ill. Admin. Code §

620.220. Groundwater in a zone of attenuation must meet Class II GQSs. 35 Ill. Admin. Code § 620.440(b).

26. The Illinois Class I and Class II GQSs for contaminants identified in this report are as follows:

Chemical	Class I GQS (mg/L) (35 Ill. Admin. Code § 620.410)	Class II GQS (mg/L) (35 IAC § 620.420)
Arsenic	0.01	0.2
Boron	2	2
Chromium	0.1	1.0
Iron	5	5
Lead	0.0075	0.10
Manganese	0.15	10
Sulfate	400	400
Total Dissolved Solids (TDS)	1,200	1,200

COUNT 1: WATER POLLUTION AT DALLMAN

27. Paragraphs 1-26 are realleged and incorporated herein by reference.

28. CWLP, through its coal ash disposal ponds, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at the CWLP Site, has discharged contaminants into the environment at the CWLP Site and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibit D, even with sometimes inconsistent sampling, CWLP has identified ongoing violations of Illinois Class I Groundwater Quality Standards on 369 separate occasions or, as shown in Exhibit E, ongoing violations of Illinois Class II Groundwater Quality Standards on 241 separate occasions, since monitoring began in late 2010.

29. Since 2010, the groundwater at the CWLP Site has exceeded the Class I GQSs for arsenic, boron, chromium, iron, lead, manganese, sulfate, and TDS, or the

Class II GQSs for arsenic, boron, iron, lead, manganese, sulfate, and TDS. 35 Ill. Admin. Code §§ 620.410, 620.420.

RELIEF REQUESTED

WHEREFORE, Complainants respectfully request that the Pollution Control Board enter an order against the Respondent, City Water, Light and Power:

- A. DECLARE that Respondent, CWLP, has violated the Illinois Environmental Protection Act's prohibitions on groundwater pollution at its the CWLP Site.
- B. IMPOSE civil penalties, pursuant to 415 Ill. Comp. Stat. 5/42.
- C. ORDER Respondent, pursuant to 415 Ill. Comp. Stat. 5/33, to:
 - i. Cease and desist from causing or threatening to cause water pollution,
 - ii. Modify its coal ash and coal combustion waste disposal and storage practices so as to avoid future groundwater contamination,
 - iii. Remediate the contaminated groundwater so that it meets applicable Illinois Groundwater Quality Standards (GQSs); and
- D. Grant other such relief as the Board deems just and proper.

Respectfully Submitted,

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*Attorneys for Sierra Club, Prairie Rivers
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Exhibit A: 2010 Map of CWLP Site Vicinity

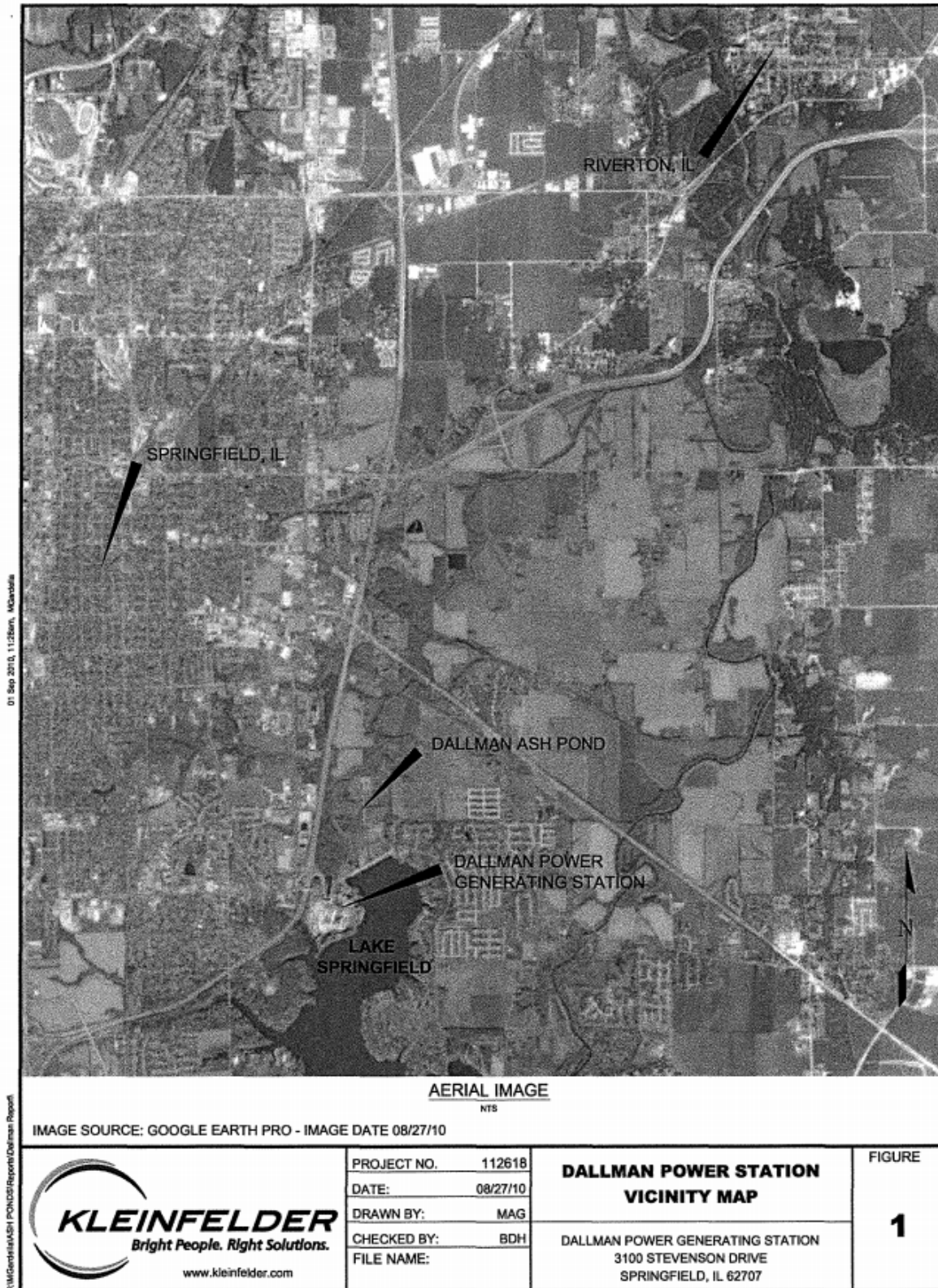


Exhibit B: 2010 Map of the CWLP Site

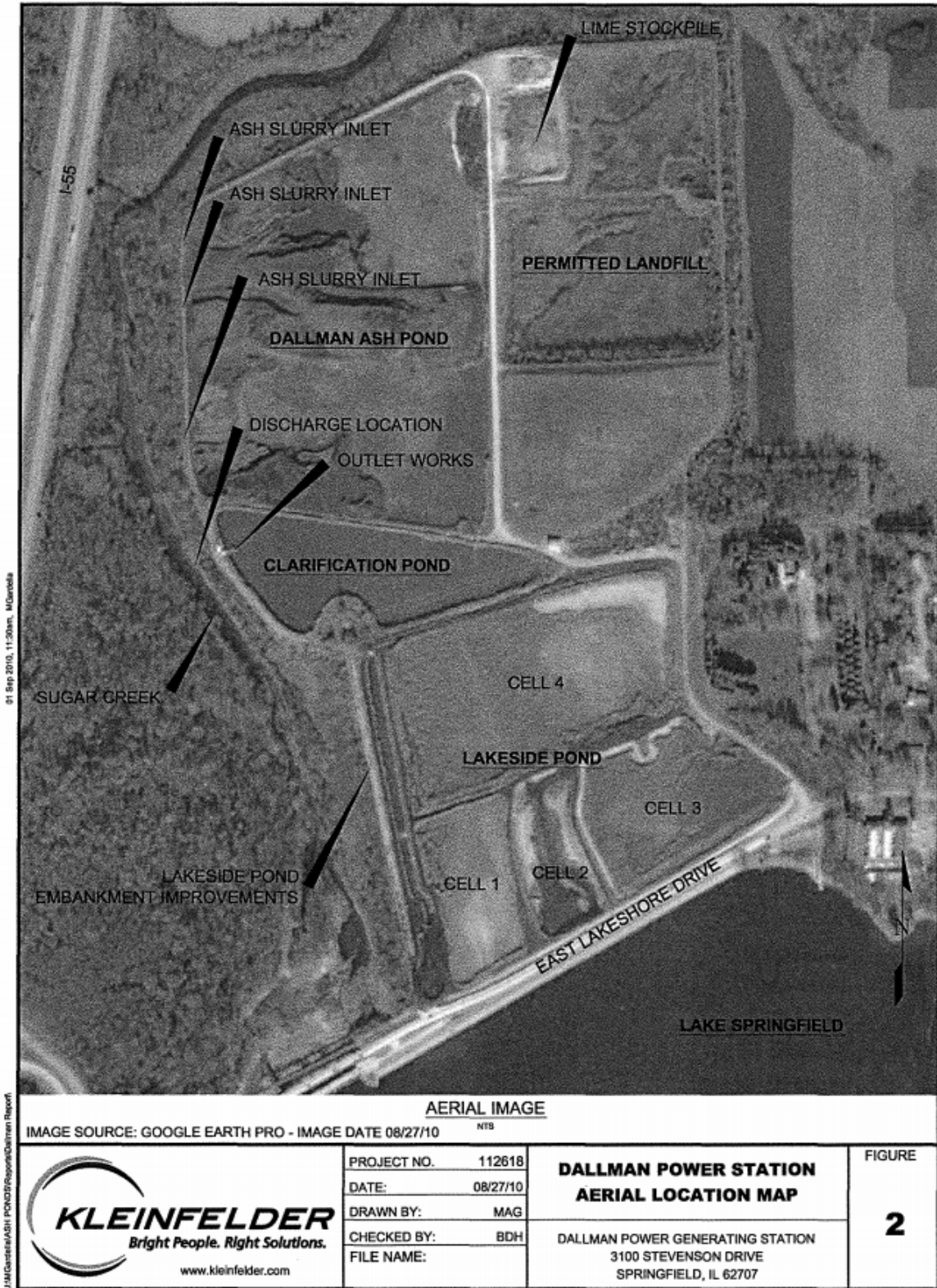
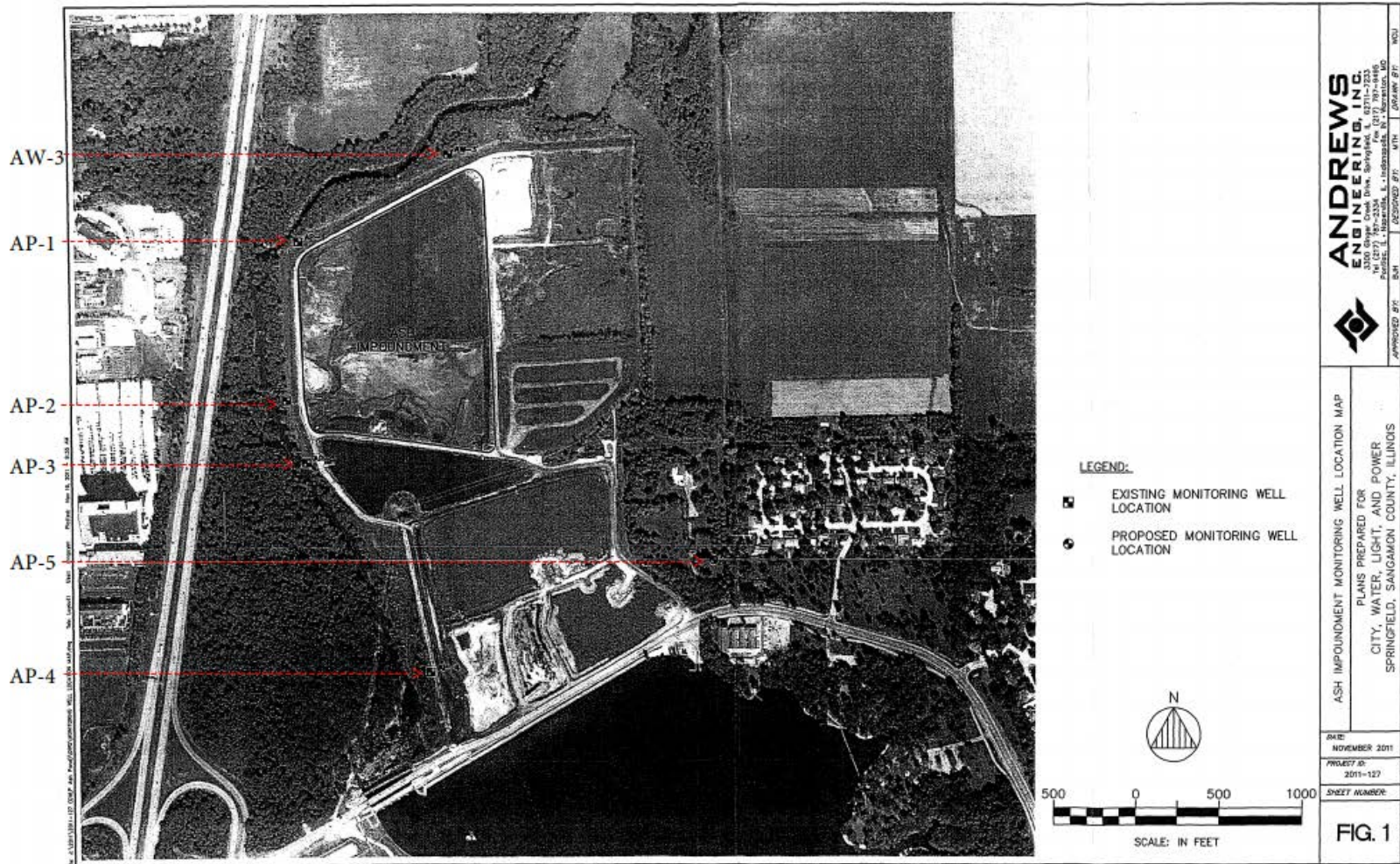


Exhibit C: 2011 Map of CWLP Site's Ash Pond-related Groundwater Monitoring Wells



Electronic Filing: Received, Clerk's Office 4/19/2019

Exhibit D: Violations of Illinois Class I groundwater standards at the CWLP Site. This table does not include pH violations.

Exceedance	Well	Pollutant	Class I GQS (mg/L)	Sample Value (mg/L)	Collection Date
1	AP-1	Arsenic	0.01	0.0141	8/23/12
2	AP-1	Arsenic	0.01	0.158	2/26/14
3	AP-1	Boron	2	14.6	2/22/12
4	AP-1	Boron	2	10.4	4/25/12
5	AP-1	Boron	2	15.2	8/23/12
6	AP-1	Boron	2	4.3	11/28/12
7	AP-1	Boron	2	3.9	2/21/13
8	AP-1	Boron	2	7.76	5/23/13
9	AP-1	Boron	2	14.7	8/28/13
10	AP-1	Boron	2	18.9	11/20/13
11	AP-1	Boron	2	17.2	5/20/14
12	AP-1	Boron	2	18	8/26/14
13	AP-1	Boron	2	17.9	11/21/14
14	AP-1	Boron	2	17.9	2/24/15
15	AP-1	Boron	2	15.7	5/28/15
16	AP-1	Boron	2	17.5	8/20/15
17	AP-1	Boron	2	18.8	11/13/15
18	AP-1	Boron	2	16.1	2/26/16
19	AP-1	Boron	2	17.2	5/13/16
20	AP-1	Boron	2	17.9	8/4/16
21	AP-1	Boron	2	17.3	11/18/16
22	AP-1	Boron	2	22.5	2/16/17
23	AP-1	Boron	2	13.9	5/31/17
24	AP-1	Boron	2	19.4	8/2/17
25	AP-1	Boron	2	20.3	11/9/17
26	AP-1	Boron	2	15.8	5/4/18
27	AP-1	Boron	2	19.1	7/9/18
28	AP-1	Iron	5	5.08	6/1/10
29	AP-1	Iron	5	35.3	2/22/12
30	AP-1	Iron	5	18.3	4/25/12
31	AP-1	Iron	5	9.22	8/23/12
32	AP-1	Iron	5	23.4	11/28/12
33	AP-1	Iron	5	13.3	2/21/13

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34	AP-1	Iron	5	12.2	5/23/13
35	AP-1	Iron	5	25.8	8/28/13
36	AP-1	Iron	5	27.1	11/20/13
37	AP-1	Iron	5	27.7	2/26/14
38	AP-1	Iron	5	48.3	5/20/14
39	AP-1	Iron	5	32.5	8/26/14
40	AP-1	Iron	5	32.7	11/21/14
41	AP-1	Iron	5	25.8	2/24/15
42	AP-1	Iron	5	30.1	5/28/15
43	AP-1	Iron	5	24.4	8/20/15
44	AP-1	Iron	5	26.3	11/13/15
45	AP-1	Iron	5	27.3	2/26/16
46	AP-1	Iron	5	25.6	5/13/16
47	AP-1	Iron	5	24.6	8/4/16
48	AP-1	Iron	5	25	11/18/16
49	AP-1	Iron	5	30.5	2/16/17
50	AP-1	Iron	5	9.66	5/31/12017
51	AP-1	Iron	5	24.5	11/9/17
52	AP-1	Lead	0.0075	0.0184	2/22/12
53	AP-1	Lead	0.0075	0.0291	2/26/14
54	AP-1	Manganese	0.15	0.27	6/1/10
55	AP-1	Manganese	0.15	0.702	2/22/12
56	AP-1	Manganese	0.15	0.864	4/25/12
57	AP-1	Manganese	0.15	0.564	8/23/12
58	AP-1	Manganese	0.15	0.744	11/28/12
59	AP-1	Manganese	0.15	0.732	2/21/13
60	AP-1	Manganese	0.15	0.182	5/23/13
61	AP-1	Manganese	0.15	0.447	8/28/13
62	AP-1	Manganese	0.15	0.468	11/20/13
63	AP-1	Manganese	0.15	0.47	2/26/14
64	AP-1	Manganese	0.15	0.877	5/20/14
65	AP-1	Manganese	0.15	0.484	8/26/14
66	AP-1	Manganese	0.15	0.482	11/21/14
67	AP-1	Manganese	0.15	0.319	2/24/15
68	AP-1	Manganese	0.15	0.391	5/28/15
69	AP-1	Manganese	0.15	0.353	8/20/15
70	AP-1	Manganese	0.15	0.546	11/13/15
71	AP-1	Manganese	0.15	0.493	2/26/16

Electronic Filing: Received, Clerk's Office 4/19/2019

72	AP-1	Manganese	0.15	0.398	5/13/16
73	AP-1	Manganese	0.15	0.378	8/4/16
74	AP-1	Manganese	0.15	0.399	11/18/16
75	AP-1	Manganese	0.15	0.45	2/16/17
76	AP-1	Manganese	0.15	0.338	5/31/17
77	AP-1	Manganese	0.15	0.448	8/2/17
78	AP-1	Manganese	0.15	0.459	11/9/17
79	AP-1	Sulfate	400	521	2/22/12
80	AP-1	Sulfate	400	463	4/25/12
81	AP-1	Sulfate	400	469	8/23/12
82	AP-1	Sulfate	400	488	11/28/12
83	AP-1	Sulfate	400	506	2/21/13
84	AP-1	Sulfate	400	603	5/23/13
85	AP-1	Sulfate	400	597	8/28/13
86	AP-1	Sulfate	400	581	11/20/13
87	AP-1	Sulfate	400	436	2/26/14
88	AP-1	Sulfate	400	615	5/20/14
89	AP-1	Sulfate	400	594	8/26/14
90	AP-1	Sulfate	400	619	11/21/14
91	AP-1	Sulfate	400	504	2/24/15
92	AP-1	Sulfate	400	486	5/28/15
93	AP-1	Sulfate	400	550	8/20/15
94	AP-1	Sulfate	400	594	2/26/16
95	AP-1	Sulfate	400	597	5/13/16
96	AP-1	Sulfate	400	612	8/4/16
97	AP-1	Sulfate	400	589	11/18/16
98	AP-1	Sulfate	400	645	2/16/17
99	AP-1	Sulfate	400	532	5/31/17
100	AP-1	Sulfate	400	672	8/2/17
101	AP-1	Sulfate	400	664	11/9/17
102	AP-1	Sulfate	400	573	5/4/18
103	AP-1	Sulfate	400	674	7/9/18
104	AP-1	TDS	1200	1390	5/23/13
105	AP-1	TDS	1200	1380	8/28/13
106	AP-1	TDS	1200	1250	11/20/13
107	AP-1	TDS	1200	1360	5/20/14
108	AP-1	TDS	1200	1300	8/26/14
109	AP-1	TDS	1200	1490	11/21/14

Electronic Filing: Received, Clerk's Office 4/19/2019

110	AP-1	TDS	1200	1230	2/24/15
111	AP-1	TDS	1200	1260	5/28/15
112	AP-1	TDS	1200	1280	11/13/15
113	AP-1	TDS	1200	1430	5/13/16
114	AP-1	TDS	1200	1390	8/4/16
115	AP-1	TDS	1200	1320	11/18/16
116	AP-1	TDS	1200	1430	2/16/17
117	AP-1	TDS	1200	1450	8/2/17
118	AP-1	TDS	1200	1420	11/9/17
119	AP-1	TDS	1200	1300	5/4/19
120	AP-1	TDS	1200	1520	7/9/18
121	AP-2	Arsenic	0.01	0.0331	8/24/12
122	AP-2	Arsenic	0.01	0.0156	11/28/12
123	AP-2	Arsenic	0.01	0.0738	2/21/13
124	AP-2	Arsenic	0.01	0.034	5/23/13
125	AP-2	Arsenic	0.01	0.0224	8/28/13
126	AP-2	Boron	2	2.63	6/1/10
127	AP-2	Boron	2	5	2/22/12
128	AP-2	Boron	2	5.51	4/25/12
129	AP-2	Boron	2	6.88	8/24/12
130	AP-2	Boron	2	6.24	11/28/12
131	AP-2	Boron	2	10	2/21/13
132	AP-2	Boron	2	5.01	5/23/13
133	AP-2	Boron	2	5.46	8/28/13
134	AP-2	Boron	2	4.78	11/20/13
135	AP-2	Boron	2	4.1	2/26/14
136	AP-2	Boron	2	4.36	5/20/14
137	AP-2	Boron	2	4.84	8/26/14
138	AP-2	Boron	2	4.87	11/21/14
139	AP-2	Boron	2	4.12	2/24/15
140	AP-2	Boron	2	4.51	5/28/15
141	AP-2	Boron	2	5.01	8/20/15
142	AP-2	Boron	2	18.8	11/13/15
143	AP-2	Boron	2	4.62	2/26/16
144	AP-2	Boron	2	4.43	5/13/16
145	AP-2	Boron	2	4.4	8/4/16
146	AP-2	Boron	2	4.28	11/18/16
147	AP-2	Boron	2	3.92	2/16/17

Electronic Filing: Received, Clerk's Office 4/19/2019

148	AP-2	Boron	2	3.63	5/31/17
149	AP-2	Boron	2	3.58	8/2/17
150	AP-2	Boron	2	3.16	11/9/17
151	AP-2	Boron	2	2.94	5/4/18
152	AP-2	Boron	2	3.63	7/9/18
153	AP-2	Chromium	0.1	0.277	2/22/12
154	AP-2	Chromium	0.1	0.111	8/24/12
155	AP-2	Iron	5	242	2/22/12
156	AP-2	Iron	5	59.2	4/25/12
157	AP-2	Iron	5	90.8	8/24/12
158	AP-2	Iron	5	134	11/28/12
159	AP-2	Iron	5	87.9	2/21/13
160	AP-2	Iron	5	15.8	5/23/13
161	AP-2	Iron	5	25.1	8/28/13
162	AP-2	Iron	5	33.9	11/20/13
163	AP-2	Iron	5	29.7	5/20/14
164	AP-2	Iron	5	20.1	8/26/14
165	AP-2	Iron	5	20.4	11/21/14
166	AP-2	Iron	5	20.2	2/24/15
167	AP-2	Iron	5	21.3	5/28/15
168	AP-2	Iron	5	22.8	8/20/15
169	AP-2	Iron	5	14.1	11/13/15
170	AP-2	Iron	5	15.7	2/26/16
171	AP-2	Iron	5	6.73	5/13/16
172	AP-2	Iron	5	8.18	2/16/17
173	AP-2	Lead	0.0075	0.226	2/22/12
174	AP-2	Lead	0.0075	0.047	4/25/12
175	AP-2	Lead	0.0075	0.0599	8/24/12
176	AP-2	Lead	0.0075	0.0433	11/28/12
177	AP-2	Lead	0.0075	0.0104	8/28/13
178	AP-2	Lead	0.0075	0.015	11/20/13
179	AP-2	Manganese	0.15	2	6/1/10
180	AP-2	Manganese	0.15	21.4	2/22/12
181	AP-2	Manganese	0.15	20.7	4/25/12
182	AP-2	Manganese	0.15	22.5	8/24/12
183	AP-2	Manganese	0.15	46	11/28/12
184	AP-2	Manganese	0.15	21.6	2/21/13
185	AP-2	Manganese	0.15	20.7	5/23/13

Electronic Filing: Received, Clerk's Office 4/19/2019

186	AP-2	Manganese	0.15	20.4	8/28/13
187	AP-2	Manganese	0.15	20.3	11/20/13
188	AP-2	Manganese	0.15	11.5	2/26/14
189	AP-2	Manganese	0.15	16.7	5/20/14
190	AP-2	Manganese	0.15	19.8	8/26/14
191	AP-2	Manganese	0.15	16.6	11/21/14
192	AP-2	Manganese	0.15	25.1	2/24/15
193	AP-2	Manganese	0.15	25.5	5/28/15
194	AP-2	Manganese	0.15	31.1	8/20/15
195	AP-2	Manganese	0.15	0.546	11/13/15
196	AP-2	Manganese	0.15	16.7	2/26/16
197	AP-2	Manganese	0.15	8.42	5/13/16
198	AP-2	Manganese	0.15	7.21	8/4/16
199	AP-2	Manganese	0.15	8.17	11/18/16
200	AP-2	Manganese	0.15	7.4	2/16/17
201	AP-2	Manganese	0.15	9.16	5/31/17
202	AP-2	Manganese	0.15	10.3	8/2/17
203	AP-2	Manganese	0.15	8.5	11/9/17
204	AP-2	Sulfate	400	463	11/21/14
205	AP-2	Sulfate	400	497	2/24/15
206	AP-2	Sulfate	400	686	5/28/15
207	AP-2	Sulfate	400	711	8/20/15
208	AP-2	Sulfate	400	531	2/26/16
209	AP-2	Sulfate	400	418	5/13/16
210	AP-2	Sulfate	400	467	5/4/18
211	AP-2	Sulfate	400	656	7/9/18
212	AP-2	TDS	1200	1460	5/28/15
213	AP-2	TDS	1200	1520	8/20/15
214	AP-2	TDS	1200	1280	11/13/15
215	AP-2	TDS	1200	1650	7/9/18
216	AP-3	Arsenic	0.01	0.0144	6/1/10
217	AP-3	Arsenic	0.01	0.0254	8/24/12
218	AP-3	Arsenic	0.01	0.0136	11/28/12
219	AP-3	Arsenic	0.01	0.0784	2/21/13
220	AP-3	Arsenic	0.01	0.016	5/23/13
221	AP-3	Boron	2	11.9	6/1/10
222	AP-3	Boron	2	17.7	2/22/12
223	AP-3	Boron	2	18.4	4/25/12

Electronic Filing: Received, Clerk's Office 4/19/2019

224	AP-3	Boron	2	20.9	8/24/12
225	AP-3	Boron	2	8.03	11/28/12
226	AP-3	Boron	2	29.1	2/21/13
227	AP-3	Boron	2	18.7	5/23/13
228	AP-3	Boron	2	21.3	8/28/13
229	AP-3	Boron	2	20.6	11/20/13
230	AP-3	Boron	2	19.3	2/26/14
231	AP-3	Boron	2	19.3	5/20/14
232	AP-3	Boron	2	19.2	8/26/14
233	AP-3	Boron	2	19.5	11/21/14
234	AP-3	Boron	2	17.8	2/24/15
235	AP-3	Boron	2	16.4	5/28/15
236	AP-3	Boron	2	17.6	8/20/15
237	AP-3	Boron	2	20.1	11/13/15
238	AP-3	Boron	2	16.9	2/26/16
239	AP-3	Boron	2	16.2	5/13/16
240	AP-3	Boron	2	16.5	8/4/16
241	AP-3	Boron	2	18.6	11/18/16
242	AP-3	Boron	2	17.7	5/31/17
243	AP-3	Boron	2	18.9	8/2/17
244	AP-3	Boron	2	19.2	11/9/17
245	AP-3	Boron	2	18.5	5/4/18
246	AP-3	Boron	2	18.8	7/9/18
247	AP-3	Iron	5	10.1	6/1/10
248	AP-3	Iron	5	13.6	2/22/12
249	AP-3	Iron	5	14	4/25/12
250	AP-3	Iron	5	19.2	8/24/12
251	AP-3	Iron	5	15.5	11/28/12
252	AP-3	Iron	5	165	2/21/13
253	AP-3	Iron	5	14	5/23/13
254	AP-3	Iron	5	12.2	8/28/13
255	AP-3	Iron	5	18.1	11/20/13
256	AP-3	Iron	5	23.9	2/26/14
257	AP-3	Iron	5	16.9	5/20/14
258	AP-3	Iron	5	14.4	8/26/14
259	AP-3	Iron	5	14.3	11/21/14
260	AP-3	Iron	5	18.3	2/24/15
261	AP-3	Iron	5	22.2	5/28/15

Electronic Filing: Received, Clerk's Office 4/19/2019

262	AP-3	Iron	5	11.5	8/20/15
263	AP-3	Iron	5	14.1	11/13/15
264	AP-3	Iron	5	15.5	2/26/16
265	AP-3	Iron	5	12.6	5/13/16
266	AP-3	Iron	5	17.8	8/4/16
267	AP-3	Iron	5	13	11/18/16
268	AP-3	Iron	5	18.1	2/16/17
269	AP-3	Iron	5	8.39	5/31/17
270	AP-3	Iron	5	10.3	8/2/17
271	AP-3	Iron	5	11.5	11/9/17
272	AP-3	Lead	0.0075	0.0084	2/22/12
273	AP-3	Lead	0.0075	0.0118	8/24/12
274	AP-3	Manganese	0.15	9.25	6/1/10
275	AP-3	Manganese	0.15	10.6	2/22/12
276	AP-3	Manganese	0.15	7.24	4/25/12
277	AP-3	Manganese	0.15	8.15	8/24/12
278	AP-3	Manganese	0.15	8.64	11/28/12
279	AP-3	Manganese	0.15	6.18	2/21/13
280	AP-3	Manganese	0.15	8.9	5/23/13
281	AP-3	Manganese	0.15	7.61	8/28/13
282	AP-3	Manganese	0.15	8.99	11/20/13
283	AP-3	Manganese	0.15	5.58	2/26/14
284	AP-3	Manganese	0.15	7.73	5/20/14
285	AP-3	Manganese	0.15	8.94	8/26/14
286	AP-3	Manganese	0.15	8.24	11/21/14
287	AP-3	Manganese	0.15	8.34	2/24/15
288	AP-3	Manganese	0.15	9.11	5/28/15
289	AP-3	Manganese	0.15	8.29	8/20/15
290	AP-3	Manganese	0.15	9.64	11/13/15
291	AP-3	Manganese	0.15	9.97	2/26/16
292	AP-3	Manganese	0.15	7.91	5/13/16
293	AP-3	Manganese	0.15	7.8	8/4/16
294	AP-3	Manganese	0.15	7.83	11/18/16
295	AP-3	Manganese	0.15	8.14	2/16/17
296	AP-3	Manganese	0.15	6.92	5/31/17
297	AP-3	Manganese	0.15	7.86	8/2/17
298	AP-3	Manganese	0.15	7.52	11/9/17
299	AP-3	Sulfate	400	401	7/9/18

Electronic Filing: Received, Clerk's Office 4/19/2019

300	AW-3	Arsenic	0.01	0.0653	6/1/10
301	AW-3	Arsenic	0.01	0.0262	2/22/12
302	AW-3	Arsenic	0.01	0.129	4/25/12
303	AW-3	Arsenic	0.01	0.131	8/23/12
304	AW-3	Arsenic	0.01	0.121	11/28/12
305	AW-3	Arsenic	0.01	0.104	2/21/13
306	AW-3	Arsenic	0.01	0.015	5/23/13
307	AW-3	Arsenic	0.01	0.134	11/20/13
308	AW-3	Arsenic	0.01	0.139	2/26/14
309	AW-3	Arsenic	0.01	0.138	5/20/14
310	AW-3	Arsenic	0.01	0.134	8/26/14
311	AW-3	Arsenic	0.01	0.118	11/21/14
312	AW-3	Arsenic	0.01	0.105	2/24/15
313	AW-3	Arsenic	0.01	0.114	5/28/15
314	AW-3	Arsenic	0.01	0.121	8/20/15
315	AW-3	Arsenic	0.01	0.151	11/13/15
316	AW-3	Arsenic	0.01	0.0982	2/26/16
317	AW-3	Arsenic	0.01	0.169	5/13/16
318	AW-3	Arsenic	0.01	0.231	8/4/16
319	AW-3	Arsenic	0.01	0.224	11/18/16
320	AW-3	Arsenic	0.01	0.21	2/16/17
321	AW-3	Arsenic	0.01	0.0856	5/31/17
322	AW-3	Arsenic	0.01	0.157	8/2/17
323	AW-3	Arsenic	0.01	0.172	11/9/17
324	AW-3	Iron	5	12	6/1/10
325	AW-3	Iron	5	62.5	4/25/12
326	AW-3	Iron	5	11.5	8/23/12
327	AW-3	Iron	5	12.3	11/28/12
328	AW-3	Iron	5	13	2/21/13
329	AW-3	Iron	5	14.3	11/20/13
330	AW-3	Iron	5	11	2/26/14
331	AW-3	Iron	5	23	5/20/14
332	AW-3	Iron	5	11	8/26/14
333	AW-3	Iron	5	11	11/21/14
334	AW-3	Iron	5	9.1	2/24/15
335	AW-3	Iron	5	9.53	5/28/15
336	AW-3	Iron	5	11	8/20/15
337	AW-3	Iron	5	11.5	11/13/15

Electronic Filing: Received, Clerk's Office 4/19/2019

338	AW-3	Iron	5	25.7	5/13/16
339	AW-3	Iron	5	12.1	8/4/16
340	AW-3	Iron	5	11.5	11/18/16
341	AW-3	Iron	5	36.7	2/16/17
342	AW-3	Iron	5	16.6	8/2/17
343	AW-3	Iron	5	14.1	11/9/17
344	AW-3	Manganese	0.15	0.348	6/1/10
345	AW-3	Manganese	0.15	2.02	4/25/12
346	AW-3	Manganese	0.15	0.329	8/23/12
347	AW-3	Manganese	0.15	0.334	11/28/12
348	AW-3	Manganese	0.15	0.306	2/21/13
349	AW-3	Manganese	0.15	0.434	11/20/13
350	AW-3	Manganese	0.15	0.323	2/26/14
351	AW-3	Manganese	0.15	0.744	5/20/14
352	AW-3	Manganese	0.15	0.256	8/26/14
353	AW-3	Manganese	0.15	0.255	11/21/14
354	AW-3	Manganese	0.15	0.217	2/24/15
355	AW-3	Manganese	0.15	0.263	5/28/15
356	AW-3	Manganese	0.15	0.255	8/20/15
357	AW-3	Manganese	0.15	0.302	11/13/15
358	AW-3	Manganese	0.15	0.223	2/26/16
359	AW-3	Manganese	0.15	0.84	5/13/16
360	AW-3	Manganese	0.15	0.304	8/4/16
361	AW-3	Manganese	0.15	0.296	11/18/16
362	AW-3	Manganese	0.15	0.843	2/16/17
363	AW-3	Manganese	0.15	0.29	5/31/17
364	AW-3	Manganese	0.15	0.547	8/2/17
365	AW-3	Manganese	0.15	0.42	11/9/17
366	RW-3	Arsenic	0.01	0.0826	5/4/18
367	RW-3	Arsenic	0.01	0.0935	6/21/18
368	RW-3	Arsenic	0.01	0.136	7/9/18
369	RW-3	Arsenic	0.01	0.12	10/26/18

Exhibit E: Violations of Illinois Class II groundwater standards at CWLP's Dallman Generating Station. This table does not include pH violations.

Exceedance	Well	Pollutant	Class II GQS (mg/L)	Sample Value (mg/L)	Collection Date
1	AP-1	Boron	2	14.6	2/22/12
2	AP-1	Boron	2	10.4	4/25/12
3	AP-1	Boron	2	15.2	8/23/12
4	AP-1	Boron	2	4.3	11/28/12
5	AP-1	Boron	2	3.9	2/21/13
6	AP-1	Boron	2	7.76	5/23/13
7	AP-1	Boron	2	14.7	8/28/13
8	AP-1	Boron	2	18.9	11/20/13
9	AP-1	Boron	2	17.2	5/20/14
10	AP-1	Boron	2	18	8/26/14
11	AP-1	Boron	2	17.9	11/21/14
12	AP-1	Boron	2	17.9	2/24/15
13	AP-1	Boron	2	15.7	5/28/15
14	AP-1	Boron	2	17.5	8/20/15
15	AP-1	Boron	2	18.8	11/13/15
16	AP-1	Boron	2	16.1	2/26/16
17	AP-1	Boron	2	17.2	5/13/16
18	AP-1	Boron	2	17.9	8/4/16
19	AP-1	Boron	2	17.3	11/18/16
20	AP-1	Boron	2	22.5	2/16/17
21	AP-1	Boron	2	13.9	5/31/17
22	AP-1	Boron	2	19.4	8/2/17
23	AP-1	Boron	2	20.3	11/9/17
24	AP-1	Boron	2	15.8	5/4/18
25	AP-1	Boron	2	19.1	7/9/18
26	AP-1	Iron	5	5.08	6/1/10
27	AP-1	Iron	5	35.3	2/22/12
28	AP-1	Iron	5	18.3	4/25/12
29	AP-1	Iron	5	9.22	8/23/12
30	AP-1	Iron	5	23.4	11/28/12
31	AP-1	Iron	5	13.3	2/21/13
32	AP-1	Iron	5	12.2	5/23/13
33	AP-1	Iron	5	25.8	8/28/13

Electronic Filing: Received, Clerk's Office 4/19/2019

34	AP-1	Iron	5	27.1	11/20/13
35	AP-1	Iron	5	27.7	2/26/14
36	AP-1	Iron	5	48.3	5/20/14
37	AP-1	Iron	5	32.5	8/26/14
38	AP-1	Iron	5	32.7	11/21/14
39	AP-1	Iron	5	25.8	2/24/15
40	AP-1	Iron	5	30.1	5/28/15
41	AP-1	Iron	5	24.4	8/20/15
42	AP-1	Iron	5	26.3	11/13/15
43	AP-1	Iron	5	27.3	2/26/16
44	AP-1	Iron	5	25.6	5/13/16
45	AP-1	Iron	5	24.6	8/4/16
46	AP-1	Iron	5	25	11/18/16
47	AP-1	Iron	5	30.5	2/16/17
48	AP-1	Iron	5	9.66	5/31/17
49	AP-1	Iron	5	24.5	11/9/17
50	AP-1	Sulfate	400	521	2/22/12
51	AP-1	Sulfate	400	463	4/25/12
52	AP-1	Sulfate	400	469	8/23/12
53	AP-1	Sulfate	400	488	11/28/12
54	AP-1	Sulfate	400	506	2/21/13
55	AP-1	Sulfate	400	603	5/23/13
56	AP-1	Sulfate	400	597	8/28/13
57	AP-1	Sulfate	400	581	11/20/13
58	AP-1	Sulfate	400	436	2/26/14
59	AP-1	Sulfate	400	615	5/20/14
60	AP-1	Sulfate	400	594	8/26/14
61	AP-1	Sulfate	400	619	11/21/14
62	AP-1	Sulfate	400	504	2/24/15
63	AP-1	Sulfate	400	486	5/28/15
64	AP-1	Sulfate	400	550	8/20/15
65	AP-1	Sulfate	400	594	2/26/16
66	AP-1	Sulfate	400	597	5/13/16
67	AP-1	Sulfate	400	612	8/4/16
68	AP-1	Sulfate	400	589	11/18/16
69	AP-1	Sulfate	400	645	2/16/17
70	AP-1	Sulfate	400	532	5/31/17
71	AP-1	Sulfate	400	672	8/2/17

Electronic Filing: Received, Clerk's Office 4/19/2019

72	AP-1	Sulfate	400	664	11/9/17
73	AP-1	Sulfate	400	573	5/4/18
74	AP-1	Sulfate	400	674	7/9/18
75	AP-1	TDS	1200	1390	5/23/13
76	AP-1	TDS	1200	1380	8/28/13
77	AP-1	TDS	1200	1250	11/20/13
78	AP-1	TDS	1200	1360	5/20/14
79	AP-1	TDS	1200	1300	8/26/14
80	AP-1	TDS	1200	1490	11/21/14
81	AP-1	TDS	1200	1230	2/24/15
82	AP-1	TDS	1200	1260	5/28/15
83	AP-1	TDS	1200	1280	11/13/15
84	AP-1	TDS	1200	1430	5/13/16
85	AP-1	TDS	1200	1390	8/4/16
86	AP-1	TDS	1200	1320	11/18/16
87	AP-1	TDS	1200	1430	2/16/17
88	AP-1	TDS	1200	1420	11/9/17
89	AP-1	TDS	1200	1300	5/4/18
90	AP-1	TDS	1200	1530	7/9/18
91	AP-2	Boron	2	2.63	6/1/10
92	AP-2	Boron	2	5	2/22/12
93	AP-2	Boron	2	5.51	4/25/12
94	AP-2	Boron	2	6.88	8/24/12
95	AP-2	Boron	2	6.24	11/28/12
96	AP-2	Boron	2	10	2/21/13
97	AP-2	Boron	2	5.01	5/23/13
98	AP-2	Boron	2	5.46	8/28/13
99	AP-2	Boron	2	4.78	11/20/13
100	AP-2	Boron	2	4.1	2/26/14
101	AP-2	Boron	2	4.36	5/20/14
102	AP-2	Boron	2	4.84	8/26/14
103	AP-2	Boron	2	4.87	11/21/14
104	AP-2	Boron	2	4.12	2/24/15
105	AP-2	Boron	2	4.51	5/28/15
106	AP-2	Boron	2	5.01	8/20/15
107	AP-2	Boron	2	18.8	11/13/15
108	AP-2	Boron	2	4.62	2/26/16
109	AP-2	Boron	2	4.43	5/13/16

Electronic Filing: Received, Clerk's Office 4/19/2019

110	AP-2	Boron	2	4.4	8/4/16
111	AP-2	Boron	2	4.28	11/18/16
112	AP-2	Boron	2	3.92	2/16/17
113	AP-2	Boron	2	3.63	5/31/17
114	AP-2	Boron	2	3.58	8/2/17
115	AP-2	Boron	2	3.16	11/9/17
116	AP-2	Boron	2	2.94	5/4/18
117	AP-2	Boron	2	3.63	7/9/18
118	AP-2	Iron	5	242	2/22/12
119	AP-2	Iron	5	59.2	4/25/12
120	AP-2	Iron	5	90.8	8/24/12
121	AP-2	Iron	5	134	11/28/12
122	AP-2	Iron	5	87.9	2/21/13
123	AP-2	Iron	5	15.8	5/23/13
124	AP-2	Iron	5	25.1	8/28/13
125	AP-2	Iron	5	33.9	11/20/13
126	AP-2	Iron	5	29.7	5/20/14
127	AP-2	Iron	5	20.1	8/26/14
128	AP-2	Iron	5	20.4	11/21/14
129	AP-2	Iron	5	20.2	2/24/15
130	AP-2	Iron	5	21.3	5/28/15
131	AP-2	Iron	5	22.8	8/20/15
132	AP-2	Iron	5	14.1	11/13/15
133	AP-2	Iron	5	15.7	2/26/16
134	AP-2	Iron	5	6.73	5/13/16
135	AP-2	Iron	5	8.18	2/16/17
136	AP-2	Lead	0.1	0.226	2/22/12
137	AP-2	Manganese	10	21.4	2/22/12
138	AP-2	Manganese	10	20.7	4/25/12
139	AP-2	Manganese	10	22.5	8/24/12
140	AP-2	Manganese	10	46	11/28/12
141	AP-2	Manganese	10	21.6	2/21/13
142	AP-2	Manganese	10	20.7	5/23/13
143	AP-2	Manganese	10	20.4	8/28/13
144	AP-2	Manganese	10	20.3	11/20/13
145	AP-2	Manganese	10	11.5	2/26/14
146	AP-2	Manganese	10	16.7	5/20/14
147	AP-2	Manganese	10	19.8	8/26/14

Electronic Filing: Received, Clerk's Office 4/19/2019

148	AP-2	Manganese	10	16.6	11/21/14
149	AP-2	Manganese	10	25.1	2/24/15
150	AP-2	Manganese	10	25.5	5/28/15
151	AP-2	Manganese	10	31.1	8/20/15
152	AP-2	Manganese	0.15	0.546	11/13/15
153	AP-2	Manganese	10	16.7	2/26/16
154	AP-2	Manganese	10	10.3	8/2/17
155	AP-2	Sulfate	400	463	11/21/14
156	AP-2	Sulfate	400	497	2/24/15
157	AP-2	Sulfate	400	686	5/28/15
158	AP-2	Sulfate	400	711	8/20/15
159	AP-2	Sulfate	400	531	2/26/16
160	AP-2	Sulfate	400	418	5/13/16
161	AP-2	Sulfate	400	467	5/4/18
162	AP-2	Sulfate	400	656	7/9/18
163	AP-2	TDS	1200	1460	5/28/15
164	AP-2	TDS	1200	1520	8/20/15
165	AP-2	TDS	1200	1280	11/13/15
166	AP-2	TDS	1200	1650	7/9/18
167	AP-3	Boron	2	11.9	6/1/10
168	AP-3	Boron	2	17.7	2/22/12
169	AP-3	Boron	2	18.4	4/25/12
170	AP-3	Boron	2	20.9	8/24/12
171	AP-3	Boron	2	8.03	11/28/12
172	AP-3	Boron	2	29.1	2/21/13
173	AP-3	Boron	2	18.7	5/23/13
174	AP-3	Boron	2	21.3	8/28/13
175	AP-3	Boron	2	20.6	11/20/13
176	AP-3	Boron	2	19.3	2/26/14
177	AP-3	Boron	2	19.3	5/20/14
178	AP-3	Boron	2	19.2	8/26/14
179	AP-3	Boron	2	19.5	11/21/14
180	AP-3	Boron	2	17.8	2/24/15
181	AP-3	Boron	2	16.4	5/28/15
182	AP-3	Boron	2	17.6	8/20/15
183	AP-3	Boron	2	20.1	11/13/15
184	AP-3	Boron	2	16.9	2/26/16
185	AP-3	Boron	2	16.2	5/13/16

Electronic Filing: Received, Clerk's Office 4/19/2019

186	AP-3	Boron	2	16.5	8/4/16
187	AP-3	Boron	2	18.6	11/18/16
188	AP-3	Boron	2	17.7	5/31/17
189	AP-3	Boron	2	18.9	8/2/17
190	AP-3	Boron	2	19.2	11/9/17
191	AP-3	Boron	2	18.5	5/4/18
192	AP-3	Boron	2	18.8	7/9/18
193	AP-3	Iron	5	10.1	6/1/10
194	AP-3	Iron	5	13.6	2/22/12
195	AP-3	Iron	5	14	4/25/12
196	AP-3	Iron	5	19.2	8/24/12
197	AP-3	Iron	5	15.5	11/28/12
198	AP-3	Iron	5	165	2/21/13
199	AP-3	Iron	5	14	5/23/13
200	AP-3	Iron	5	12.2	8/28/13
201	AP-3	Iron	5	18.1	11/20/13
202	AP-3	Iron	5	23.9	2/26/14
203	AP-3	Iron	5	16.9	5/20/14
204	AP-3	Iron	5	14.4	8/26/14
205	AP-3	Iron	5	14.3	11/21/14
206	AP-3	Iron	5	18.3	2/24/15
207	AP-3	Iron	5	22.2	5/28/15
208	AP-3	Iron	5	11.5	8/20/15
209	AP-3	Iron	5	14.1	11/13/15
210	AP-3	Iron	5	15.5	2/26/16
211	AP-3	Iron	5	12.6	5/13/16
212	AP-3	Iron	5	17.8	8/4/16
213	AP-3	Iron	5	13	11/18/16
214	AP-3	Iron	5	18.1	2/16/17
215	AP-3	Iron	5	8.39	5/31/17
216	AP-3	Iron	5	10.3	8/2/17
217	AP-3	Iron	5	11.5	11/9/17
218	AP-3	Manganese	10	10.6	2/22/12
219	AP-3	Sulfate	400	401	7/9/18
220	AW-3	Arsenic	0.2	0.231	8/4/16
221	AW-3	Arsenic	0.2	0.224	11/18/16
222	AW-3	Arsenic	0.2	0.21	2/16/17
223	AW-3	Iron	5	12	6/1/10

Electronic Filing: Received, Clerk's Office 4/19/2019

224	AW-3	Iron	5	62.5	4/25/12
225	AW-3	Iron	5	11.5	8/23/12
226	AW-3	Iron	5	12.3	11/28/12
227	AW-3	Iron	5	13	2/21/13
228	AW-3	Iron	5	14.3	11/20/13
229	AW-3	Iron	5	11	2/26/14
230	AW-3	Iron	5	23	5/20/14
231	AW-3	Iron	5	11	8/26/14
232	AW-3	Iron	5	11	11/21/14
233	AW-3	Iron	5	9.1	2/24/15
234	AW-3	Iron	5	9.53	5/28/15
235	AW-3	Iron	5	11	8/20/15
236	AW-3	Iron	5	11.5	11/13/15
237	AW-3	Iron	5	25.7	5/13/16
238	AW-3	Iron	5	12.1	8/4/16
239	AW-3	Iron	5	11.5	11/18/16
240	AW-3	Iron	5	36.7	2/16/17
241	AW-3	Iron	5	16.6	8/2/17

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Electronic Filing, Unopposed Motion for Leave to File, and Complainants' First Amended Complaint were served to all parties of record listed below by electronic mail on April 18th, 2019.



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