

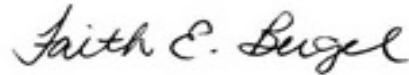
**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

In the Matter of:	)	
	)	
SIERRA CLUB, ENVIRONMENTAL	)	
LAW AND POLICY CENTER,	)	
PRAIRIE RIVERS NETWORK, and	)	
CITIZENS AGAINST RUINING THE	)	
ENVIRONMENT	)	
	)	PCB No-2013-015
Complainants,	)	(Enforcement – Water)
	)	
v.	)	
	)	
MIDWEST GENERATION, LLC,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **COMPLAINANTS’ MOITION *IN LIMINE* TO EXCLUDE NEW OR REVISED EXPERT OPINIONS BASED ON UNTIMELY DISCLOSED DOCUMENTS** copies of which are attached hereto and herewith served upon you.

Respectfully submitted,



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

*Attorney for Sierra Club*

Dated: February 4, 2022

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

In the Matter of:	)	
	)	
SIERRA CLUB, ENVIRONMENTAL	)	
LAW AND POLICY CENTER,	)	
PRAIRIE RIVERS NETWORK, and	)	
CITIZENS AGAINST RUINING THE	)	
ENVIRONMENT	)	
	)	PCB No-2013-015
Complainants,	)	(Enforcement – Water)
	)	
v.	)	
	)	
MIDWEST GENERATION, LLC,	)	
	)	
Respondent.	)	

**COMPLAINANTS’ MOITION *IN LIMINE* TO EXCLUDE  
NEW OR REVISED EXPERT OPINIONS BASED ON UNTIMELY  
DISCLOSED DOCUMENTS**

Pursuant to 35 Ill. Adm Code 101.500, Complainants request the Hearing Officer enter an order prohibiting Respondent from providing any new opinion (i.e. opinions that were not provided in the expert report and depositions) based on untimely produced documents. In support of this Motion, Complainants state as follows:

1. On January 10, 2022, pursuant to the Hearing Officer’s Order dated December 10, 2021, Respondent produced to Complainants a notice identifying additional documents Midwest Generation’s experts may rely upon. (“IDENTIFICATION OF ADDITIONAL DOCUMENTS MIDWEST GENERATION’S EXPERTS MAY RELY UPON” (hereinafter “Notice,” attached as Att. 1)). This notice included “[a]ll documents related to the Joliet 29, Powerton, Waukegan, and Will County Stations available on MWG’s Illinois CCR Rule Compliance Data and Information website ([www.midwestgenerationllc.com](http://www.midwestgenerationllc.com)) and on MWG’s Federal CCR Rule Compliance Data and Information website ([www.nrg.com/legal/coal-combustion-](http://www.nrg.com/legal/coal-combustion-)

[rresiduals.html](#)).

2. Counsel for Complainants scheduled a conference call for January 24, 2022 with counsel for Respondent during which Complainants identified concerns with the majority of the items on Respondent's Notice.

3. On January 27, 2022, counsel for Respondent sent Complainants an email curing some of the defects that Complainants had identified with Respondent's Notice (attached as Att. 2). As part of this, Respondent provided Complainants with a more specific list identifying, by name and date, the documents from the above websites that Respondent's experts would rely upon.

4. Included on this list were the following documents:

- a. Midwest Generation LLC v. Illinois EPA, PCB 21-108 - Board Order, September 9, 2021
- b. Midwest Generation LLC v. Illinois EPA, PCB 21-109 - Board Order, September 9, 2021
- c. In the Matter of: Midwest Generation LLC's Petition for Adjusted Standard (Joliet 29 Station), PCB AS21-01
  - \* MWG's Initial Filing and Attachments, May 11, 2021
  - \* Illinois EPA's Partial Recommendation, Sept. 22, 2021
- d. In the Matter of: Midwest Generation LLC's Petition for Adjusted Standard (Powerton Station), PCB AS21-02
  - \* MWG's Initial Filing and Attachments, May 11, 2021
  - \* Illinois EPA's Partial Recommendation, Sept. 22, 2021
  - \* MWG's Amended Petition, Nov. 12, 2021
- e. In the Matter of: Midwest Generation LLC's Petition for Adjusted Standard (Waukegan Station), PCB AS21-03
  - \* MWG's Initial Filing and Attachments, May 11, 2021
  - \* Presentation: "Illinois EPA Bureau of Water - Waukegan Power Station: Part 845 - CCR Surface Impoundments" by Darin LeCrone, P.E. filed with the Board on Oct. 18, 2021
  - \* MWG's Amended Petition, September 17, 2021

5. While Respondent has stated that their expert may rely on these documents in forming their testimony and opinions, Respondent has not identified which expert may rely on these documents nor what opinions these documents are related to. Assuming the Weaver Consulting experts may rely on these documents, it is still not readily apparent which part of Respondent's

expert report may rely upon these opinions. Unlike other categories of documents (e.g., items from MWG's Illinois CCR website), this category of documents (documents from the dockets listed above) did not appear in the initial Weaver Report. *See, e.g.,* Weaver Report at Bates 81496-81503 (attached as Att. 3). Granted, none of the dockets listed above in ¶ 4 existed at the time Respondent served their expert reports; however, Respondent or their experts have not supplemented any expert report, explained any new opinions at their expert depositions, or indicated their intention to rely on any of these documents at their expert depositions.

6. Respondent's failure to provide adequate notice of new opinions or new bases for existing opinions prejudices Complainants. Complainants have not been given the opportunity to have their expert review any expert testimony or opinion Respondent's experts base on these documents, so as to form an opinion concerning the accuracy and/or reliability of this portion of Respondent's expert testimony. And Respondent's continued failure to supplement its expert reports to indicate how these documents support their opinions means Complainant cannot properly prepare for cross-examination.

7. Moreover, Respondent's failure to supplement its expert opinions to include these documents is an affront to the discovery rules. Discovery rules require that parties disclose the subject matter, conclusions, opinions, qualifications, and all reports of any witness who will offer any opinion testimony. *Sinclair v. Berlin*, 325 Ill.App.3d 458, 469 (2001).

8. The purpose of this rule is to avoid surprise and permit litigants to ascertain and rely upon the opinions of experts retained by their adversaries. *Dept. of Trans. v. Crull*, 294 Ill.App.3d 531, 537 (1998). If not contained in the original report, Respondent has an ongoing duty to timely supplement or amend prior opinions or responses whenever new or additional information subsequently becomes known to that party. *Clayton v. Cnty. of Cook*, 346 Ill. App. 3d 367 (1st

Dist. 2004) (excluding an entire line of testimony about lack of supervision because it was not mentioned in pretrial disclosures).

9. This is consistent with the Hearing Officer's Order of July 18, 2017 on MWG's Motion in Limine to limit Complainants' Expert Testimony.<sup>1</sup> In that instance, Respondent produced the documents at issue after the expert's deposition. Respondent then brought a motion in limine to exclude Complainant's experts from relying on these documents.

10. Currently at issue, the dockets containing the documents listed above were all initiated in May and September by MWG itself and before expert depositions, so those initial docket filings could have been disclosed at expert depositions. MWG, however, chose not to disclose these documents at this proper time, and waited until the eve of the hearing to disclose such documents.

11. Moreover, unlike the Federal or State CCR documents, this is a whole new category of documents.

12. Complainants are prejudiced and will be unfairly surprised at the hearing as to how MWG will use – or have their experts testify about – these untimely produced documents. MWG and their experts have the benefit of having these documents for months prior to MWG's untimely disclosure. Accordingly, at the remedy hearing, MWG's experts have the ability to change or modify their previously written opinions and/or deposition testimonies based on information found in these untimely documents, all without providing any supplementation or being deposed on their new opinions.

13. Indeed, Respondent has failed to take any steps to supplement their experts report or opinion, instead providing the most minimal notice possible that one or more of its experts may

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<sup>1</sup> Available at <https://pcb.illinois.gov/documents/dsweb/Get/Document-95451>.

rely on a whole new category documents without identifying which of their experts' existing opinions (or a possible new opinion) those documents form the basis of.

14. To allow Respondent to ignore the plain language of the discovery rules defeats their purpose and encourages tactical gamesmanship. *See Chicago & Illinois Midland Ry. Co. v. Crystal Lake Indus. Park, Inc*, 225 Ill.App.3d 653, 658-59 (1992) (the trial court's admission of an expert witness' testimony that was inconsistent with his deposition testimony constituted an "egregious violation" of discovery rules, as the party did not have time to investigate and prepare accordingly).

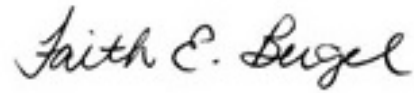
15. Complainants will be prejudiced if MWG is allowed to offer expert opinions based on a whole category of previously unidentified documents. Respondent's failure to supplement their expert opinion as required by the discovery rules benefits Respondent while prejudicing Complainants and preventing Complainants from preparing rebuttal testimony or preparing for cross examination.

16. As a result of Respondent's untimely production, Respondent's experts should be barred from providing new opinions (i.e. opinions that were not provided in the expert report and depositions) based on these untimely produced documents. Such documents may only be used to strengthen any previously stated opinion.

**WHEREFORE**, for the reasons stated above, Complainants request that the Board enter an order prohibiting Respondent from providing any new opinion (i.e. opinions that were not provided in the expert report and depositions) based on the untimely produced documents listed in ¶ 4. Such documents may only be used to strengthen any previously stated opinion.

Dated: February 4, 2022

Respectfully submitted,



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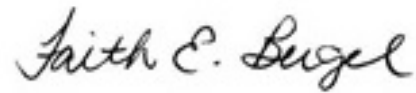
*Attorney for CARE*



**CERTIFICATE OF SERVICE**

The undersigned, Jeffrey Hammons, an attorney, certifies that I have served electronically upon the Clerk and by email upon the individuals named on the attached Service List a true and correct copy of **COMPLAINANTS' MOITION IN LIMINE TO EXCLUDE NEW OR REVISED EXPERT OPINIONS BASED ON UNTIMELY DISCLOSED DOCUMENTS** before 5 p.m. Central Time on February 4, 2022 to the email addresses of the parties on the attached Service List. The entire filing package, including exhibits, is 25 pages.

Respectfully submitted,



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Attachment 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:	)	
	)	
SIERRA CLUB, ENVIRONMENTAL LAW	)	
AND POLICY CENTER, PRAIRIE RIVERS	)	
NETWORK, and CITIZENS AGAINST	)	
RUINING THE ENVIRONMENT	)	
	)	PCB 2013-015
Complainants,	)	(Enforcement – Water)
	)	
v.	)	
	)	
MIDWEST GENERATION, LLC,	)	
	)	
Respondent.	)	

**IDENTIFICATION OF ADDITIONAL DOCUMENTS MIDWEST GENERATION’S EXPERTS MAY RELY UPON**

Pursuant to the December 10, 2021 Hearing Officer Order, in addition to the documents identified in the expert reports and depositions in this matter, the additional items on which Midwest Generation’s Experts may rely upon are:

- 1) The groundwater monitoring well reports and sample results for the four Stations through the Third Quarter of 2021;
- 2) Midwest Generation LLC’s Pre-filed Testimony of G. Allen Burton and Greg Seegert and the attachments to the pre-filed testimony filed *In the Matter of: Water Quality Standards and Effluent Limitations for the Chicago Area Waterway System and Lower Des Plaines River Proposed Amendments to 35 Ill. Adm. Code 301, 302, 3030, and 304*, Sept. 8, 2008;
- 3) The sampling, analysis and evaluation of the material in Ponds 1 and 3 at the Joliet Station and the Service Water Basin at the Powerton Station;
- 4) MWG’s Response and Supplemental Responses to Illinois EPA Violation Notices W-2020-00075 (Waukegan Generating Station); W-2020-00086 (Will County Generating Station); W-2020-00083 (Powerton Generating Station); W-2020-00085 (Joliet 29 Station);
- 5) Documents filed with the Illinois Pollution Control Board for MWG’s Petitions for Regulatory Relief: *Midwest Generation LLC v. Illinois EPA*, PCB 21-108; *Midwest Generation LLC v. Illinois EPA*, PCB 21-109; *In the Matter of: Midwest Generation LLC’s Petition for Adjusted Standard (Joliet 29 Station)*, PCB AS21-01, *In the Matter of: Midwest Generation LLC’s Petition for Adjusted Standard (Powerton Station)*, PCB AS21-02; *In the Matter of: Midwest Generation LLC’s Petition for Adjusted Standard (Waukegan Station)*, PCB AS21-03;
- 6) Midwest Generation LLC’s costs for the work required to comply with the Federal CCR Rule and Illinois CCR Rule;
- 7) All documents related to the Joliet 29, Powerton, Waukegan and Will County Stations available on MWG’s Illinois CCR Rule Compliance Data and Information website

- (www.midwestgenerationllc.com) and on MWG's Federal CCR Rule Compliance Data and Information website ([www.nrg.com/legal/coal-combustion-residuals.html](http://www.nrg.com/legal/coal-combustion-residuals.html));
- 8) MWG Consolidated Statements of Operations and Consolidated Balance Sheets, Years ended December 31, 2020 and 2019;
  - 9) KPRG, Inc. Inspections of the Joliet #29 Northeast Area through 2021 and photographs taken of the area; and,
  - 10) Lydersen, Kari, "Historic coal ash raises concerns at iconic Illinois coal plant site," December 21, 2021 (<https://energynews.us/2021/12/21/historic-coal-ash-raises-concerns-at-iconic-illinois-coal-plant-site/>).

MWG further reserves the right in rebuttal to rely on any documents relied on by Complainants' experts.

Respectfully submitted,

MIDWEST GENERATION, LLC.

By           /s/ Kristen L. Gale            
One of Its Attorneys

Dated: January 10, 2022

Jennifer T. Nijman  
Susan M. Franzetti  
Kristen L. Gale  
NIJMAN FRANZETTI LLP  
10 South LaSalle Street, Suite 3600  
Chicago, IL 60603  
312-251-5255

Attachment 2



Faith Bugel &lt;fbugel@gmail.com&gt;

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**Additional Documents MWG's Experts May Rely Upon**

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**Kristen Gale** <kg@nijmanfranzetti.com>

Thu, Jan 27, 2022 at 4:51 PM

To: "Faith Bugel (fbugel@gmail.com)" &lt;fbugel@gmail.com&gt;

Cc: "KCourtney@elpc.org" &lt;KCourtney@elpc.org&gt;, Cantrell Jones &lt;cjones@elpc.org&gt;, Greg Wannier &lt;greg.wannier@sierraclub.org&gt;, Jennifer Nijman &lt;jn@nijmanfranzetti.com&gt;

Faith:

Below are answers to your questions about the additional documents Midwest Generation's Experts may rely upon:

No. 2: Pursuant to the Agreed schedule we must give notice of "any additional items experts will rely on based on supplemental production." This document was produced on October 1, 2021, so it falls within the supplemental deadline. In any case, its purpose is rebuttal to your expert's rebuttal opinion.

No. 4 - MWG's original VN response was already in the Weaver report, so it is not an "additional document" that they will rely upon. The supplemental VN responses were produced as supplemental production to you on April 22, 2021 and October 1, 2021, so it falls within the agreed "based on supplemental production."

No. 5 - The experts may rely upon the following documents:

1. Midwest Generation LLC v. Illinois EPA, PCB 21-108 - Board Order, September 9, 2021
2. Midwest Generation LLC v. Illinois EPA, PCB 21-109 - Board Order, September 9, 2021
3. In the Matter of: Midwest Generation LLC's Petition for Adjusted Standard (Joliet 29 Station), PCB AS21-01
  - \* MWG's Initial Filing and Attachments, May 11, 2021
  - \* Illinois EPA's Partial Recommendation, Sept. 22, 2021
4. In the Matter of: Midwest Generation LLC's Petition for Adjusted Standard (Powerton Station), PCB AS21-02
  - \* MWG's Initial Filing and Attachments, May 11, 2021
  - \* Illinois EPA's Partial Recommendation, Sept. 22, 2021
  - \* MWG's Amended Petition, Nov. 12, 2021
5. In the Matter of: Midwest Generation LLC's Petition for Adjusted Standard (Waukegan Station), PCB AS21-03
  - \* MWG's Initial Filing and Attachments, May 11, 2021
  - \* Presentation: "Illinois EPA Bureau of Water - Waukegan Power Station: Part 845 - CCR Surface Impoundments" by Darin LeCrone, P.E. filed with the Board on Oct. 18, 2021
  - \* MWG's Amended Petition, September 17, 2021

No. 6 - The documents that the experts may rely upon are MWG13-15\_ 112253- 112324, MWG13-15\_ 112325- 112468, and MWG13-15\_ 112469- 112735

No. 7 - The experts may rely upon the following additional documents:

Joliet 29:

Illinois CCR Website

1. Weekly and Monthly Inspection reports for 2021
2. Annual Inspection Report, 2021
3. Structural Stability Assessment 2021
4. Safety Factor Assessment 2021
5. Operating Permit Application
6. Closure Permit Application
7. Post Closure Plan
8. Fugitive Dust Plan

Powerton:

Illinois CCR Website -  
Former Ash Basin

1. Weekly and Monthly Inspection reports for 2021
2. Annual Inspection Report, 2021

Electronic Filing: Received, Clerk's Office 2/04/2022

3. Structural Stability Assessment 2021
4. Safety Factor Assessment 2021
5. Operating Permit Application
6. Post Closure Plan
7. Fugitive Dust Plan

#### Bypass Basin

1. Weekly and Monthly Inspection reports for 2021
2. Preliminary Retrofit Plan
3. Annual Inspection Report, 2021
4. Structural Stability Assessment 2021
5. Safety Factor Assessment 2021
6. Operating Permit Application
7. Post Closure Plan
8. Preliminary Closure Plan 2021
9. Fugitive Dust Plan

#### Ash Surge Basin

1. Weekly and Monthly Inspection reports for 2021
2. Preliminary Retrofit Plan
3. Annual Inspection Report, 2021
4. Structural Stability Assessment 2021
5. Safety Factor Assessment 2021
6. Operating Permit Application
7. Post Closure Plan
8. Preliminary Closure Plan 2021
9. Alternate Closure Completeness letter
10. Fugitive Dust Plan

#### Metal Cleaning Basin

1. Weekly and Monthly Inspection reports for 2021
2. Preliminary Retrofit Plan
3. Annual Inspection Report, 2021
4. Initial Structural Stability Assessment 2021
5. Initial Safety Factor Assessment 2021

#### Will County

##### Ponds 2S and 3S

1. Weekly and Monthly Inspection reports for 2021
2. Annual Inspection Report, 2021
3. Structural Stability Assessment 2021
4. Safety Factor Assessment 2021
5. Closure Plan Amended 2021
6. Post Closure Plan 2021
7. Operating Permit Application
8. Fugitive Dust Plan
9. Alternate Closure Completeness Letter for Pond 2S

##### Ponds 1N and 1S

1. Weekly and Monthly Inspection reports for 2021
2. Annual Inspection Report, 2021
3. Structural Stability Assessment 2021
4. Safety Factor Assessment 2021

#### Waukegan

##### West Pond

1. Weekly and Monthly Inspection reports for 2021
2. Annual Inspection Report, 2021
3. Structural Stability Assessment 2021

- 4. Safety Factor Assessment 2021
- 5. Preliminary Closure Plan 2021
- 6. Operating Permit Application
- 7. Closure Permit Application
- 8. Closure Plan 2021
- 9. Fugitive Dust Plan

East Pond

- 1. Weekly and Monthly Inspection reports for 2021
- 2. Annual Inspection Report, 2021
- 3. Structural Stability Assessment 2021
- 4. Safety Factor Assessment 2021
- 5. Preliminary Closure Plans 2021
- 6. Operating Permit Application
- 7. Closure Permit Application
- 8. Closure Plan 2021
- 9. Post Closure Plan 2021
- 10. Fugitive Dust Plan
- 11. Alternate Closure Completeness Letter

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<<https://www.linkedin.com/company/nijman-franzetti-llp>> [cid:image003.png@01D8139D.87DD4C50] <<https://twitter.com/nijmanfranzetti?lang=en>>

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4 attachments



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Nijman Franzetti LLP



Attachment 3

**Appendix B**  
**List of References**

**REFERENCES**

- American Society for Testing Materials (ASTM) Standard Test Method for Shake Extraction of Solid Waste with Water (ASTM D3987-85).
- CCR Rule Compliance Data and Information. (2021, April). Retrieved from <https://www.nrg.com/legal/coal-combustion-residuals.html>
- Civil & Environmental Consultants, Inc. (2016, January 18). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station.*
- Civil & Environmental Consultants, Inc. (2016, January). *Annual Inspection Report West and East Ash Basins, Waukegan Station.*
- Civil & Environmental Consultants, Inc. (2017, July). *Annual Inspection Report Powerton Station – Former Ash Basin.*
- Civil & Environmental Consultants, Inc. (2017, October). *Annual Inspection Report West and East Ash Basins, Waukegan Station.*
- Civil & Environmental Consultants, Inc. (2018, July). *Annual Inspection Report Powerton Station – Former Ash Basin.*
- Civil & Environmental Consultants, Inc. (2018, October). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station.*
- Civil & Environmental Consultants, Inc. (2018, October). *Annual Inspection Report East Ash Pond and West Ash Pond, Waukegan Station.*
- Civil & Environmental Consultants, Inc. (2019, July). *Annual Inspection Report Powerton Station – Former Ash Basin.*
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- Civil & Environmental Consultants, Inc. (2020, October). *Annual Inspection Report Ash Pond 2, Joliet Station.*

## Electronic Filing: Received, Clerk's Office 2/04/2022

- Civil & Environmental Consultants, Inc. (2020, October). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station.*
- Civil & Environmental Consultants, Inc. (2020, October). *Annual Inspection Report East Ash Pond and West Ash Pond, Waukegan Station.*
- Code of Federal Regulations (CFR), Title 40. Protection of Environment, Chapter I. Environmental Protection Agency, Subchapter I. Solid Wastes, Part 257. Criteria for Classification of Solid Waste Disposal Facilities and Practices.
- Code of Federal Regulations (CFR), Title 40. Protection of Environment, Chapter I. Environmental Protection Agency, Subchapter I. Solid Wastes, Part 258. Criteria for Municipal Solid Waste Landfills.
- Code of Federal Regulations (CFR), Title 40. Protection of Environment, Chapter I. Environmental Protection Agency, Subchapter I. Solid Wastes, Part 261. Identification and Listing of Hazardous Waste.
- ENSR Consulting. (1998, October). *Phase I Environmental Site Assessment of Commonwealth Edison Joliet #29 Generating Station 1800 Channahon Road, Joliet, Illinois.*
- ENSR Consulting. (1998, October). *Phase I Environmental Site Assessment of the ComEd Powerton Generating Station, Pekin, Illinois.*
- ENSR Consulting. (1998, October). *Phase I Environmental Site Assessment of Commonwealth Edison Waukegan Generating Station, 10 Greenwood Avenue, Waukegan, Illinois.*
- ENSR Consulting. (1998, October). *Phase I Environmental Site Assessment of Commonwealth Edison Will County Generating Station, 529 E. Romeo Road, Romeoville, Illinois.*
- ENSR Consulting. (1998, December). *Phase II Environmental Site Assessment of Commonwealth Edison Joliet #29 Generating Station 1800 Channahon Road, Joliet, Illinois.*
- ENSR Consulting. MWG Exhibit 19D. (1998, December). *Phase II Environmental Site Assessment of Commonwealth Edison Powerton Generating Station Route 29 & Mantino Road, Pekin, Illinois.*
- ENSR Consulting. (1998, November). *Phase II Environmental Site Assessment of Commonwealth Edison Waukegan Generating Station, 10 Greenwood Avenue, Waukegan, Illinois.*
- ENSR Consulting. (1998, December). *Phase II Environmental Site Assessment of Commonwealth Edison Will County Generating Station, 529 East Romeo Road, Romeoville, Illinois.*

Geosyntec Consultants. (2016, October). *Closure Plan Ash Surge Basin and Bypass Basin, Powerton Station.*

Geosyntec Consultants. (2016, October). *Closure Plan South Ash Ponds 2S and 3S, Will County Station.*

Geosyntec Consultants. (2016, October). *Closure East and West Ash Basins, Waukegan Station.*

Geosyntec Consultants. (2016, October). *History of Construction Ash Surge Basin and Bypass Basin, Powerton Station.*

Geosyntec Consultants. (2016, October). *History of Construction East and West Ash Basins, Waukegan Station.*

Geosyntec Consultants. (2018, April). *History of Construction Former Ash Basin, Powerton Station.*

Geosyntec Consultants. (2018, October). *Placement Above the Uppermost Aquifer Location Restrictions, Ash Surge Basin and Bypass Basin, Powerton Station.*

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