

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

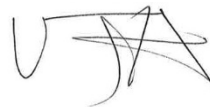
In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
)	PCB No-2013-015
Complainants,)	(Enforcement – Water)
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondent)	

NOTICE OF ELECTRONIC FILING

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

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the document **ADDITIONAL ITEMS ON WHICH COMPLAINANTS' EXPERT INTENDS TO RELY.**

Respectfully submitted,



John Agada
 Legal Assistant
 Environmental Law & Policy Center
 35 E. Wacker Dr., Suite 1600
 Chicago, IL 60601
jagada@elpc.org
 (312) 795-3719

Dated: September 7, 2017

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)	

ADDITIONAL ITEMS ON WHICH COMPLAINANTS' EXPERT INTENDS TO RELY

Pursuant to the August 31, 2017 Hearing Officer Order, Complainants identify below items on which Dr. James Kunkel intends to rely, which are in addition to (1) the documents identified in the expert reports in this matter, (2) the documents identified in the depositions in this matter, (3) the documents identified by Complainants on April 27, 2017 (“Additional Items on Which Experts Intend to Rely From Supplemental Fact Discovery” and “Groundwater Monitoring Reports and Figures Relied Upon in Dr. James Kunkel’s Expert Reports,” both attached), and (4) the supplemental information provided by Complainants on March 31, 2016 pursuant to Respondent’s March 17, 2016 request.

- MWG13-15_178-248
- MWG13-15_5093-5136
- MWG13-15_21746-21750
- MWG13-15_41172-41183
- MWG13-15_43854
- MWG13-15_43856-43857
- MWG13-15_43858-43862
- MWG13-15_44125-44146
- MWG13-15_44558-44583

- MWG13-15_45513-45647
- MWG13-15_46140-46193
- MWG13-15_56632-56638
- MWG13-15_61411-61552
- MWG13-15_61553-61574
- MWG13-15_61575-62839

Dated: September 7, 2017

Respectfully submitted,

Lindsay Dubin
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
(312) 795-3726

*Attorneys for ELPC, Sierra Club and
Prairie Rivers Network*

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

Gregory E. Wannier
2101 Webster St., Ste. 1300
Oakland, CA 94612
(415) 977-5646
Greg.wannier@sierraclub.org

Attorneys for Sierra Club

Abel Russ
Attorney
Environmental Integrity Project
1000 Vermont Avenue NW

Washington, DC 20005
aruss@environmentalintegrity.org
802-482-5379

Attorney for Prairie Rivers Network

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)

Attorney for CARE

Attachments

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)	
)	
Complainants,)	
)	
v.)	PCB No-2013-015
)	(Enforcement – Water)
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

**ADDITIONAL ITEMS ON WHICH EXPERTS INTEND TO RELY FROM
SUPPLEMENTAL FACT DISCOVERY**

Consistent with the April 27, 2017 deadline delineated in the April 11, 2017 PCB 2013-15 Hearing Officer Order, identified below are additional items on which Dr. James Kunkel intends to rely from supplemental fact discovery.

Joliet #29 Generating Station

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2015 Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_49775-49838 (July 22, 2015)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2016 Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_57070-57138 (Apr. 12, 2016)

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2016 Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_57538-57610 (July 19, 2016)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2016 Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_57974-58046 (Oct. 20, 2016)

NRG Energy, *Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2016 Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_58292-58388 (Jan. 13, 2017)

Powerton Generating Station

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2015, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_49839-49966 (July 22, 2015)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2016, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_57139-57250 (Apr. 22, 2016)

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2016, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_57611-57720 (July 19, 2016)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2016, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_58047-58154 (Oct. 20, 2016)

NRG Energy, *Annual and Quarterly Groundwater Monitoring Results Fourth Quarter 2016, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_58155-58291 (Jan. 13, 2017)

NRG Energy, *Midwest Generation Powerton Generating Station – Bypass Basin* Bates MWG-13-15_58583-58587 (Jan. 24, 2017)

NRG Energy, *Midwest Generation Powerton Generating Station – Metals Cleaning Basin* Bates MWG-13-15_58588-58592 (Jan. 24, 2017)

Waukegan Generating Station

Mark Nagel, NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2015 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_50029-50092 (July 22, 2015)

Mark Nagel, NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2016 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_57251-57310 (Apr. 22, 2016)

Mark Nagel, NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2016 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_57721-57779 (July 19, 2016)

Mark Nagel, NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2016 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_57844-57905 (Oct. 20, 2016)

KPRG and Associates, *Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2016 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_58490-58582 (Jan. 19, 2017)

Will County Generating Station

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2015, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_49967-50028 (July 22, 2015)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2016, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_57311-57374 (Apr. 22, 2016)

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2016, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_57780-57843 (July 14, 2016)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2016, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_57906-57973 (Oct. 20, 2016)

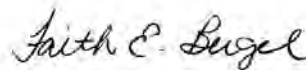
NRG Energy, *Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2016, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_58389-58489 (Jan. 13, 2017)

All Sites

Water Levels, Water-quality Data, and Geologic Logs of MW-11, -12, -16, -17, -18, and -19, MWG13-15_59778-60324

Water Quality CCR Laboratory Results MWG13-15_58593-59238

Respectfully submitted,



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

Attorney for Sierra Club



Lindsay Dubin
Jessica Dexter
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
jdexter@elpc.org
(312) 795-3726 (phone)

*Attorneys for ELPC, Sierra Club and
Prairie Rivers Network*

Greg Wannier
Sierra Club
2101 Webster St., Ste. 1300
Oakland, CA 94612
greg.wannier@sierraclub.org
(415) 977-5646 (phone)

Attorney for Sierra Club

Abel Russ
Environmental Integrity Project
1000 Vermont Avenue NW
Washington, DC 20005
aruss@environmentalintegrity.org
802-662-7800 (phone)
202-296-8822 (fax)

Attorney for Prairie Rivers Network

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)

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)	
)	
Complainants,)	
)	
v.)	PCB No-2013-015
)	(Enforcement – Water)
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

**GROUNDWATER MONITORING REPORTS AND FIGURES RELIED UPON
IN DR. JAMES KUNKEL'S EXPERT REPORTS**

Consistent with the April 27, 2017 deadline delineated in the April 11, 2017 PCB 2013-15 Hearing Officer Order, identified below are additional items on which Dr. James Kunkel intends to rely.

Joliet #29 Generating Station

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2011 Joliet #29 Generating Station- Ash Impoundment* Bates Comp. 000001-000054 (May 13, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2011 Joliet #29 Generating Station- Ash Impoundment* Bates Comp. 000131-000183 (Aug. 1, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2011 Joliet #29 Generating Station- Ash Impoundment* Bates Comp. 000398-000449 (Oct. 21, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Annual Report 2011 Joliet #29 Generating Station- Ash Impoundment* Bates Comp. 000667-000741 (Mar. 5, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2012 Joliet #29 Generating Station- Ash Impoundment* Bates Comp. 000860-000914 (May 11, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2012 – Revisions to Original Report Submitted May 11, 2012 Joliet 29 Generating Station - Ash Impoundments* Bates Comp. 001060-001131 (July 30, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2012 Joliet #29 Generating Station- Ash Impoundments* Bates Comp. 001348-001409 (Aug. 16, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2012 Joliet #29 Generating Station- Ash Impoundments* Bates MWG13-15_38864-38925 (Nov. 9, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2012 Joliet #29 Generating Station- Ash Impoundments* Bates Comp. 002001-002070 (Jan. 21, 2013)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2013 Joliet #29 Generating Station-Ash Impoundments* Bates Comp. 002157-002225 (Apr. 25, 2013)

KPRG Associates, *Quarterly Groundwater Monitoring Results – Second Quarter 2013 Joliet #29 Generating Station – Ash Impoundments* Bates Comp. 002475-002562 (July 22, 2013)

KPRG and Associates, *Quarterly Groundwater Monitoring Results – Third Quarter 2013 Joliet #29 Generating Station – Ash Impoundments* Bates Comp. 002839-002901 (Oct. 17, 2013)

KPRG and Associates, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_17346-17442 (Jan. 21, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2014 Joliet #29 Generating Station – Ash Impoundments* Bates MMW13-15_20287-20345 (Apr. 23, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2014 Joliet #29 Generating Station – Ash Impoundments* Bates MWG13-15_43871-43935 (Oct. 20, 2014)

NRG Energy, *Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Joliet #29 Generating Station – Ash Impoundment* Bates MWG13-15_44983-45167 (Jan. 6, 2015)

Powerton Generating Station

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Ash Impoundment* Bates MWG-13-15_39620-39646 (Apr. 18, 2011)

Patrick Engineering, *Bi-Monthly Groundwater Monitoring Results – February 2011, Powerton Generating Station – Metal Cleaning Basin* Bates Comp. 000055-000092 (May 13, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin* Comp. 000093-000130 (May 13, 2011)

Patrick Engineering, *Bi-Monthly Groundwater Monitoring Results – April 2011, Powerton Generating Station – Metal Cleaning Basin* Bates Comp. 000184-000219 (Aug. 1, 2011)

Electronic Filing: Received, Clerk's Office 9/07/2017

Patrick Engineering, *Bi-Monthly Groundwater Monitoring Results – June 2011, Powerton Generating Station – Metal Cleaning Basin* Bates Comp. 000220-000259 (Aug. 1, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin* Bates Comp. 000260-000305 (Aug. 1, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2011, Powerton Generating Station – Ash Impoundment* Bates 000450-000450 (Oct. 21, 2011)

Patrick Engineering, *Bi-Monthly Groundwater Monitoring Results – December 2011, Powerton Generating Station – Metal Cleaning Basin* Bates Comp. 000585-000625 (Jan. 17, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin* Bates Comp. 000626-000666 (Jan. 18, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Annual Report 2011, Powerton Generating Station – Ash Impoundment* Bates Comp. 000742-000793 (Mar. 5, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarterly Report 2012, Powerton Generating Station – Ash Impoundment* Bates Comp. 000915-000963 (May 11, 2012)

Patrick Engineering, *Groundwater Monitoring Results – April 2012, Powerton Generating Station – Metal Cleaning Basin* Bates Comp. 001019-001059 (May 17, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012, Powerton Generating Station – Ash Impoundment* Bates Comp. 001132-001221 (July. 30, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarterly Report 2012, Powerton Generating Station – Ash Impoundment* Bates Comp. 001410-001460 (Aug. 16, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2012, Powerton Generating Station – Bypass Cleaning Basin* Bates Comp. 001509-001534 (Sept. 12, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter Report 2012, Powerton Generating Station – Ash Impoundment* Bates Comp. 001535-001594 (Nov. 9, 2012)

Patrick Engineering, *Bi-Monthly Groundwater Monitoring Results – October 2011, Powerton Generating Station – Metal Cleaning Basin* Bates Comp. 001727-001766 (Dec. 14, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Fourth Quarter Report 2012, Powerton Generating Station – Ash Impoundment* Bates Comp. 001767-001928 (Jan. 11, 2013)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter Report 2013, Powerton Generating Station – Ash Impoundment* Bates Comp. 002290-002405 (Apr. 26, 2013)

KPRG, *Quarterly Groundwater Monitoring Results – Second Quarter 2013, Powerton Generating Station – Ash Impoundments* Bates Comp. 002563-002716 (July 22, 2013)

KPRG, *Quarterly Groundwater Monitoring Results – Third Quarter 2013, Powerton Generating Station – Ash Impoundments* Bates Comp. 002902-003027 (Oct. 17, 2013)

KPRG, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual, Powerton Generating Station – Ash Impoundments* Bates Comp. 003152-003301 (Jan. 21, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2014, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_20001-20126 (Apr. 23, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2014, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_43936-44060 (Oct. 24, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2014/Annual Report, Powerton Generating Station – Ash Impoundments* Bates MWG-13-15_45168-45327 (Jan. 22, 2015)

Waukegan Generating Station

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2011 Waukegan Generating Station- Ash Impoundment* Bates Comp. 000306-000347 (Aug. 1, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2011 Waukegan Generating Station- Ash Impoundment* Bates Comp. 000539-000584 (Oct. 21, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Annual Report 2011 Waukegan Generating Station- Ash Impoundment* Bates Comp. 000794-000859 (Mar. 5, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012 Waukegan Generating Station - Ash Impoundments* Bates Comp. 001222-001277 (July 30, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2012 Waukegan Generating Station- Ash Impoundment* Bates Comp. 001461-001508 (Aug. 16, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2012 Waukegan Generating Station- Ash Impoundment* Bates Comp. 001595-001646 (Nov. 9, 2012)

Quarterly Groundwater Monitoring Results – Fourth Quarter 2012 Waukegan Generating Station- Ash Impoundments Bates Comp. 001929-002000 (Jan. 16, 2013)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2013 Waukegan Generating Station- Ash Impoundments* Bates Comp. 002226-002289 (Apr. 25, 2013)

KPRG and Associates, *Quarterly Groundwater Monitoring Results – Second Quarter 2013 Waukegan Generating Station – Ash Impoundments* Bates Comp. 002717-Comp. 002772 (July 22, 2013)

KPRG and Associates, *Quarterly Groundwater Monitoring Results – Third Quarter 2013 Waukegan Generating Station – Ash Impoundments* Bates Comp. 003028-003087 (Oct. 17, 2013)

KPRG and Associates, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual Waukegan Generating Station – Ash Impoundments* Bates Comp. 003302-003389 (Jan. 21, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2014 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_20603-20668 (Apr. 23, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Second Quarter 2014 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_44818-44875 (July 21, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2014 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_43695-43848 (Oct. 20, 2014)

NRG Energy, *Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Waukegan Generating Station – Ash Impoundments* Bates MWG13-15_45328-45416 (Jan. 22, 2015)

Table 1. Groundwater Elevations - Midwest Generation, LLC, Waukegan Station, Waukegan, IL Bates MWG13-15_48439

Table 2. Groundwater Analytical Results - Midwest Generation LLC, Waukegan Station, Waukegan, IL Bates MWG13-15_43856

URS Corp, *Annual Groundwater Monitoring Report – July 2014, Environmental Land Use Control Implementation, Midwest Generation Waukegan Generating Station* Bates MWG13-15_11798-11954 (July 14, 2014)

Retec, *Commonwealth Edison, Former Griess-Pfleger Tanner Site* Bates MWG13-15_14532-14536 (Aug. 28, 2002)

Will County Generating Station

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2011, Will County Generating Station – Ash Impoundment* Bates MWG-13-15_42296-42344 (Apr. 18, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2011, Will County Generating Station – Ash Impoundment* Bates Comp. 000348-000397 (Aug. 1, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2011, Will County Generating Station – Ash Impoundment* Bates Comp. 000483-000538 (Oct. 21, 2011)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2012, Will County Generating Station – Ash Impoundment* Bates Comp. 000964-001018 (May 11, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012* Bates Comp. 001278-001347 (July 30, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Second Quarter 2012, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_25694-25753 (Aug. 16, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Third Quarter 2012, Will County Generating Station – Ash Impoundments* Bates Comp. 001647-001726 (Nov. 9, 2012)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2012, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_15756-15836 (Jan. 15, 2013)

Patrick Engineering, *Quarterly Groundwater Monitoring Results – First Quarter 2013, Will County Generating Station – Ash Impoundments* Bates Comp. 002071-002156 (Apr. 29, 2013)

KPRG, *Quarterly Groundwater Monitoring Results – Second Quarter 2013, Will County Generating Station – Ash Impoundments* Bates Comp. 002773-002838 (July 22, 2013)

KPRG, *Quarterly Groundwater Monitoring Results – Third Quarter 2013, Will County Generating Station – Ash Impoundments* Bates Comp. 003088-003151 (Oct. 17, 2013)

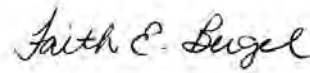
KPRG, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual, Will County Generating Station – Ash Impoundments* Bates Comp. 003390-003485 (Jan. 21, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – First Quarter 2014, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_15670-15745 (Apr. 23, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Third Quarter 2014, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_44061-44121 (Oct. 20, 2014)

NRG Energy, *Quarterly Groundwater Monitoring Results – Fourth Quarter 2014, Will County Generating Station – Ash Impoundments* Bates MWG-13-15_45417-45510 (Jan. 23, 2015)

Respectfully submitted,



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

Attorney for Sierra Club



Lindsay Dubin
Jessica Dexter
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
jdexter@elpc.org
(312) 795-3726 (phone)

*Attorneys for ELPC, Sierra Club and
Prairie Rivers Network*

Greg Wannier
Sierra Club
2101 Webster St., Ste. 1300
Oakland, CA 94612
greg.wannier@sierraclub.org
(415) 977-5646 (phone)

Attorney for Sierra Club

Abel Russ
Environmental Integrity Project
1000 Vermont Avenue NW
Washington, DC 20005
aruss@environmentalintegrity.org

802-662-7800 (phone)
202-296-8822 (fax)

Attorney for Prairie Rivers Network

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)

Dated: April 27, 2017

Attorney for CARE

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing Notice of Electronic filing and **ADDITIONAL ITEMS ON WHICH COMPLAINANTS' EXPERT INTENDS TO RELY** was filed electronically on September 7, 2017 and served via electronic mail on September 7, 2017 on the parties listed on the following Service List.



Lindsay Dubin
Staff Attorney
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
(312) 795-3712

PCB 2013-015 SERVICE LIST:

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

Gregory E. Wannier
2101 Webster St., Ste. 1300
Oakland, CA 94612
(415) 977-5646
Greg.wannier@sierraclub.org

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
100 West Randolph St
Suite 11-500
Chicago, IL 60601

Abel Russ
Attorney
Environmental Integrity Project
1000 Vermont Avenue NW
Washington, DC 20005
aruss@environmentalintegrity.org

Lindsay Dubin
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
(312) 795-3726

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

(802) 662-7800 (phone)
(202) 296-8822 (fax)

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)