

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,)	
)	
Respondents)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **COMPLAINANTS' WITNESS SPECIFIC EXHIBIT LISTS**, copies of which are served on you along with this notice.

Respectfully submitted,



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(312) 795-3726

Dated: October 6, 2017

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
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MIDWEST GENERATION, LLC,)	
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Respondents)	

COMPLAINANTS' WITNESS SPECIFIC EXHIBIT LISTS

To increase efficiency during the October 23, 2017 to October 27, 2017 hearing in PCB No. 2013-15, listed below are exhibits that Complainants request the witnesses Richard Gnat, Christopher Lux, Rebecca Maddox, and Maria Race authenticate prior to the hearing in this matter. This list is being submitted for purposes of pre-hearing authentication only and the exhibits listed herein are only a subset of the exhibits that Complainants may introduce at the hearing, all of which are listed in the final exhibit list in **COMPLAINANTS' AMENDED PRE-HEARING MEMORANDUM**, which was filed on October 2, 2017.

Exhibits Produced by Complainants to Be Authenticated by Richard Gnat

First Page	Last Page	Description
2475	2562	KPRG Associates, Quarterly Groundwater Monitoring Results – Second Quarter 2013 Joliet #29 Generating Station – Ash Impoundments. See also: Bates Comp. 002475-002562 (July 22, 2013)

Exhibits Produced by Respondents to Be Authenticated by Richard Gnat

First Page	Last Page	Description
17348	17442	KPRG and Associates, Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual Joliet #29 Generating Station – Ash Impoundments Bates MWG13 (Jan. 21, 2014)
594	598	Midwest Generation, Compliance Commitment Agreement-Well Installation Documentation, Waukegan Station, (Jan 15, 2013)
4170	4323	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Powerton Generating Station – Ash Impoundments. See also: Bates Comp. 002563-002716 (July 22, 2013)
6670	6734	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Will County Generating Station – Ash Impoundments. Also: Bates Comp. 002773-002838 (July 22, 2013)
7362	7362	KPRG, Figure 1: Agreed Upon Monitoring Well Location, Powerton, (Dec. 12, 2012)
12827	12845	Letter from Richard Gnat, Principal, KPRG and Associates, Inc. to Maria Race, re Liner Inspection-West and East Ash Pond at Waukegan Generation Station (Aug. 31, 2005)
13087	13239	KPRG, Phase II Environmental Site Investigation of Will County Station, (Sept. 30, 2009)
13870	13886	Patrick Engineering Inc., Hydrogeological Assessment Plan, Joliet Generating Station No. 29, (July 2010)
14522	14544	Waukegan Station New Wells and ELUC Information
14744	14747	Midland Standard Engineering & Testing, Inc., Laboratory Testing Services-Will County station (Aug. 22, 2012)
15670	15745	NRG Energy, Quarterly Groundwater Monitoring Results – First Quarter 2014 Will County Generating Station – Ash Impoundments (Apr. 23, 2014)

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17975	18039	KPRG and Associates, Quarterly Groundwater Monitoring Results – Third Quarter 2013 Joliet #29 Generating Station – Ash Impoundments. Also: Bates Comp. 002839-002901 (Oct. 17, 2013)
18824	19071	KPRG, Coal Ash and Slag Removal Documentation
19067	19428	KPRG, Joliet #29 Ash Berm Removal Summary (Sept. 20, 2007)
19430	19441	KPRG, Joliet #29 Former Ash Burial Area Runoff Erosion Repair Documentation, (Sept. 26, 2009)
19442	19452	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2009, (Aug. 27, 2009)
19454	19468	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection and Erosion Repair Documentation, (2010)
19470	19473	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2012, (Sept. 19, 2012)
19474	19481	KPRG, Joliet #29 Former Ash Burial Area Runoff Erosion Repair, (Sept. 26, 2012)
19483	19483	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2013, (Aug. 21, 2013)
19485	19668	KPRG, Joliet CCB Determination Support, (July 25, 2005)
19486	19668	KPRG, Joliet #29 Summary Report (July 25, 2005)
19681	19807	KPRG, Quarterly Groundwater Monitoring Results – Third Quarter 2013, Powerton Generating Station – Ash Impoundments (Oct. 17, 2013). Also Bates Comp. 002902-003027
19808	19969	KPRG, Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual, Powerton Generating Station – Ash Impoundments.(Jan. 21, 2014). Also: Bates Comp. 003152-003301
20001	20126	NRG Energy, Quarterly Groundwater Monitoring Results-First Quarter 2014, Powerton Generating Station-Ash Impoundments (Apr. 23, 2014)
20287	20345	NRG Energy, Quarterly Groundwater Monitoring Results-First Quarter 2014, Joliet Generating Station-Ash Impoundments (Apr. 23, 2014)
20458	20545	KPRG and Associates, Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual Waukegan Generating Station – Ash Impoundments. Also: Bates Comp. 003302-003389 (Jan. 21, 2014)
20546	20602	KPRG and Associates, Quarterly Groundwater Monitoring Results – Third Quarter 2013 Waukegan Generating Station – Ash Impoundments. Also: Bates Comp. 003028-003087 (Oct. 17, 2013)
20603	20668	NRG Energy, Quarterly Groundwater Monitoring Results – First Quarter 2014 Waukegan Generating Station – Ash Impoundments Bates (Apr. 23, 2014)
20764	20828	KPRG, Quarterly Groundwater Monitoring Results – Third Quarter 2013, Will County Generating Station – Ash Impoundments. Also: Bates Comp. 003088-003151 (Oct. 17, 2013)

24264	24386	Letter from Richard Gnat, KPRG, to Maria Race re: Geotechnical Analysis of Soil Surrounding Settling Basins/Ponds (10/13/2005).
24387	24392	Letter from Richard Gnat, KPRG, to Maria Race re: Re-Issuance of Figure 4-1 for Geotechnical Summary Report (Oct. 25,2005).
26405	26499	KPRG, Quarterly Groundwater Monitoring Results – Fourth Quarter 2013 and Annual, Will County Generating Station – Ash Impoundments. Also: Bates Comp. 003390-003485 (Jan. 21, 2014)
39708	39759	Patrick Engineering, Quarterly Groundwater Monitoring Results – Annual Report 2011, Powerton Generating Station – Ash Impoundment (Mar. 5, 2012) (See also Bates Comp. 000742-000793)
43695	43848	Groundwater Monitoring Report, Waukegan, Third Quarter 2014 (2014)
43849	43862	Groundwater data tables for Waukegan Wells MW-1 through MW-15 (various date ranges)
43868	43869	Richard Gnat curriculum vitae
43871	43935	Groundwater Monitoring Report, Joliet 29, Third Quarter 2014
43936	44060	Groundwater Monitoring Report, Powerton, Third Quarter 2014
44061	44121	NRG Energy, Quarterly Groundwater Monitoring Results – Third Quarter 2014, Will County Generating Station – Ash Impoundments Bates (Oct. 20, 2014)
44147	44147	Letter from Richard Gnat to Peter O'Day, Ash Burial Runoff Inspection (Aug. 28, 2014)
44148	44152	Letter from Richard Gnat to James DiCola, Erosion Repair Documentation (Sept. 22, 2011)
44153	44155	Letter from Richard Gnat to James DiCola, Inspection Summary Letter Aug. 22, 2011)
44269	44269	Email from James DiCola to Peter O'Day, Ash Burial Runoff Inspection (July 28, 2013)
44557	44557	Email from James DiCola to Richard Gnat re Ash Burial Area (Sept. 15, 2010)
44818	44875	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2014 Waukegan Generating Station – Ash Impoundments (July 21, 2014)
44983	45167	NRG Energy, Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Joliet #29 Generating Station – Ash Impoundment (Jan. 6, 2015)
45168	45327	NRG Energy, Quarterly Groundwater Monitoring Results – Fourth Quarter 2014/Annual Report, Powerton Generating Station – Ash Impoundments (Jan. 22, 2015)
45328	45416	NRG Energy, Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Waukegan Generating Station – Ash Impoundments (Jan. 22, 2015)

45417	45510	NRG Energy, Quarterly Groundwater Monitoring Results – Fourth Quarter 2014, Will County Generating Station – Ash Impoundments (Jan. 23, 2015)
45512	45512	KPRG, Aerial Distribution of Groundwater Sampling Results (Oct. 6, 2014)
45513	45647	TestAmerica Analytical Report (June 3, 2014)
45648	45649	KPRG Boring Logs for MWs 8 and 9, Waukegan, (April 29, 2014)
45656	45710	KPRG and Associates, Quarterly Groundwater Monitoring Results – Second Quarter 2013 Waukegan Generating Station – Ash Impoundments. Also: Bates Comp. 002717-Comp. 002772 (July 22, 2013)
48439	48439	Table 1. Groundwater Elevations - Midwest Generation, LLC, Waukegan Station, Waukegan, IL Bates MWG13-15_48439
48644	48644	KPRG 1974 Aerial Photo of Waukegan Station
48647	48710	NRG Energy, Quarterly Groundwater Monitoring Results – First Quarter 2015, Joliet 29 Generating Station – Ash Impoundments (Apr. 24 2015)
48711	48843	NRG Energy, Quarterly Groundwater Monitoring Results – First Quarter 2015, Powerton Generating Station – Ash Impoundments (Apr. 24 2015)
48844	48901	NRG Energy, Quarterly Groundwater Monitoring Results – First Quarter 2015, Will County Generating Station – Ash Impoundments (Apr. 24 2015)
48902	48958	NRG Energy, Quarterly Groundwater Monitoring Results – First Quarter 2015, Waukegan Generating Station – Ash Impoundments (Apr. 24 2015)
49565	49652	KPRG, CCB Determination Support, Midwest Generaiton Will County Station (Sept. 8, 2015)
49742	49753	TestAmerica Groundwater Data (July 20, 2015)
49775	49838	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015 Joliet #29 Generating Station – Ash Impoundments (July 22, 2015)
49839	49966	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Powerton Generating Station – Ash Impoundments(July 22, 2015)
49967	50028	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Will County Generating Station – Ash Impoundments (July 22, 2015)
50029	50092	Mark Nagel, NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015 Waukegan Generating Station – Ash Impoundments Bates (July 22, 2015)
56145	56196	3Q 2015 Groundwater Monitoring Results, Waukegan
56210	56225	2015 Groundwater Monitoring Report, Powerton
56444	56450	2015 Groundwater Monitoring Report, Waukegan

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56525	56545	2015 Groundwater Monitoring Report, Will County
56632	56638	Draft Groundwater Analytical Results, Waukegan
57070	57138	1Q 2016 Groundwater Monitoring Results, Joliet 29
57139	57250	1Q 2016 Groundwater Monitoring Results, Powerton
57251	57310	1Q 2016 Groundwater Monitoring Results, Waukegan
57311	57374	1Q 2016 Groundwater Monitoring Results, Will County
57538	57610	2Q 2016 Groundwater Monitoring Results, Joliet 29
57611	57720	2Q 2016 Groundwater Monitoring Results, Powerton
57721	57779	2Q 2016 Groundwater Monitoring Results, Waukegan
57780	57843	NRG, Quarterly Groundwater Monitoring Report - Will County Generating Station , 2nd Quarter 2016 (July 14, 2016)
57844	57905	NRG, Quarterly Groundwater Monitoring Report - Waukegan Generation Station, 3rd Quarter 2016 (Oct. 20, 2016)
57906	57973	NRG, Quarterly Groundwater Monitoring Report - Will County Generating Station, 3rd Quarter 2016 (Oct. 20, 2016)
57974	58046	NRG, Quarterly Groundwater Monitoring Report - Joliet #29 Generating Station, 3rd Quarter 2016 (Oct. 20, 2016)
58047	58154	NRG, Quarterly Groundwater Monitoring Report - Powerton Generating Station, 3rd Quarter 2016 (Oct. 20, 2016)
58155	58291	NRG, Annual and Quarterly Groundwater Monitoring Report - Powerton Generating Station, 4th Quarter 2016 (Jan. 13, 2017)
58292	58388	NRG, Annual and Quarterly Groundwater Monitoring Report - Joliet #29 Generating Station, 4th Quarter 2016 (Jan. 13, 2017)
58389	58489	NRG, Annual and Quarterly Groundwater Monitoring Report - Will County Generating Station, 4th Quarter 2016 (Jan. 13, 2017)
58490	58582	NRG, Annual and Quarterly Groundwater Monitoring Report - Waukegan Generating Station, 4th Quarter 2016 (Jan. 19, 2017)
58583	58587	Powerton Generating Station - Bypass Basin Quarterly Groundwater Sampling Summary - 4th Quarter 2016 (Jan. 24, 2017)
58588	58592	Powerton Generating Station - Metals Cleaning Basin Quarterly Groundwater Sampling Summary - 4th Quarter 2016 (Jan. 24, 2017)
58593	59238	TestAmerica Analytical Report, Joliet #29 (May 31, 2016)
59778	60324	TestAmerica Analytical Report, Joliet# 29 (Feb. 25, 2016)
61411	61442	TestAmerica Analytical Report, Waukegan (Dec. 21, 2016)
61553	61574	NRG, Annual Groundwater Monitoring Report - July 2016 - Waukegan Generating Station
61575	62839	TestAmerica Analytical Reports 2017
11233	11237	Letter from Richard Gnat to Lynn Dunaway, IEPA, Powerton Generating Station (Sept. 11, 2013)
56349	56359	2015 Groundwater Monitoring Report, Joliet 29
		Gnat Deposition Transcript

Exhibits Produced by Respondents to be Authenticated by Christopher Lux

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11961	11965	Letter from Michael Smith, Structural Project Engineer, Doyen and Associates, Incorporated to Tom Dilla, ComEd, Waukegan Station (Aug. 7, 1997)
22014	22018	Email Exchange Re "Powerton Secondary Ash Basin Relining" (Mar. 27, 2013)
22020	22020	Email Exchange Re Ground Water Issues (Mar. 27, 2013)
22023	22023	Email from William Gaynor to Amy Hanrahan and others, 4/9/2013.
22765	22766	Email from William Gaynor to Charles J Hart and others, 9/24/2013.
22846	22849	Email from William Gaynor to Christopher Lux, 3/8/2013.
24221	24231	Letter from Michael J. Smith, Valdes Engineering, to Chris Lux, re: Waukegan Ash Pond Berm Visual Inspection (6/12/14).
28031	28034	Email from Terry Kosmatka to Christopher lux and other, 9/13/2013.
31492	31493	Photographs of liner installation
44588	44589	Email about Ash Dumping on Station Property, (Sept. 12, 2014)
44621	44622	Email, from C. Lux to Wayne Ollila (Oct. 30, 2014)
44623	44623	Email from Chris Lux to Mike Smith (May 27, 2014)
49272	49285	Letter from Michael Smith to Christopher Lux (May 29, 2015)
49286	49292	Email Exchange Re: NRG Waukegan Station West & East Ash Pond Liner Repairs (Mar. 21, 2015)
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Exhibits Produced by Respondents to be Authenticated by Rebecca Maddox

First Page	Last Page	Description
13774	13774	Email Exchange Re "Ash Pond #3"
14177	14181	Email Exchange Re "3S Ash Pond Liner Damage-Will County"
22934	22943	Email from Chris Lux to James Sault and other, 5/23/2013.
27001	27001	Email from Jeffrey Beaudry to Aron Yakima and others, 7/17/2013.
27130	27136	Email Exchange Re: Leak Location Survey for 2S Pond at MWGen - Will County
27555	27556	Email from David Kamano to Jeff Beaudry and others, 2/12/2013.
28326	28354	Will County Email Exchanges
28849	28851	Fax from Tedd Mills, Brieser Construction, to Beckie Maddox, 10/19/2009.
28862	28863	Stormwater Construction Site Inspection Report signed by Beckie Maddox, 10/1/2009.

29589	29590	Letter from Donald Claybaugh to IEPA re: "IEMA incident" at Will County (12/11/2008).
44969	44973	Email from Brad Castle to Rebecca Maddox , Fred Veenbaas (May 23, 2012)
44979	44979	Email from Rebecca Maddox to Margaret Ruane (May 29, 2012)
48566	48566	Email from Rebecca Maddox to Yvonne Dedrickson (Sept. 1, 2010)
48568	48569	Email from Raymond Wolan to Rebecca Maddox and Daryl Miller (July 28, 2010)
48586	48586	Email from Rebecca Maddox to John Shields and Black Connolly (July 28, 2010)
48612	48612	Email from Rebecca Maddox to Christopher Lux (Sept. 3, 2008)

Exhibits Produced by Complainants to Be Authenticated by Maria Race

Comp.	1410	1460	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarterly Report 2012, Powerton Generating Station – Ash Impoundment Bates Comp. 001410-001460 (Aug. 16, 2012)
Comp.	53740	53740	Geosyntech, Notification of Intent to Initiate Closure of the Former Ash Basin, Powerton (Dec. 17, 2015)

Exhibits Produced or Provided by Respondents to Be Authenticated by Maria Race

178	248	July 2013 ELUC groundwater report
3872	3910	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin (Aug. 1, 2011) (See also Bates Comp. 000260-000305)
4748	4783	Powerton Bi-Monthly Groundwater Monitoring Report, Metal Cleaning Basin, April 2011 (See also Bates Comp. 000184-000219)
38471	38523	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011 Joliet #29 Generating Station- Ash Impoundment Bates Comp. 000131-000183 (Aug. 1, 2011)
40549	40588	Powerton Bi-Monthly Groundwater Monitoring Report, Metal Cleaning Basin, June 2011 (Aug. 1, 2011) (See also Bates Comp. 000220-000259)
41210	41251	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011 Waukegan Generating Station- Ash Impoundment (Aug. 1, 2011) (See also Bates Comp. 000306-000347)
1	176	NRT, <i>Non-disclosable Impoundment Evaluations</i> , (2005)

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328	332	Illinois Environmental Protection Agency, <i>Violation Notice: Midwest Generation, LLC, Waukegan Generating Station</i> , (June 11, 2012)
333	341	Illinois Environmental Protection Agency, <i>Violation Notice: Midwest Generation, LLC, Will County Generating Station</i> , (June 11, 2012)
342	347	Joliet Notice of Violation (June 11, 2012)
348	358	Illinois Environmental Protection Agency, <i>Violation Notice: Midwest Generation, LLC, Powerton Generating Station</i> , (June 11, 2012)
364	383	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice --MWG response to the Joliet NOV, Jul. 27, 2012
384	406	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice 6282--MWG response to Powerton NOV, Jul. 27, 2012
407	420	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice --MWG response to the Waukegan NOV, Jul. 27, 2012
421	437	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice --MWG response to the Will County NOV, Jul. 27, 2012
818	819	Unsigned Letter from Maria Race to Lynn Dunaway
821	2458	United States Environmental Protection Agency, <i>Questionnaire for the Steam Electric Power Generation Effluent Guidelines</i> , (2010)
2731	2785	Patrick Engineering, Quarterly Groundwater Monitoring Results-First Quarter 2012-Joliet 29 Generating Station (May 11, 2012)
2786	2857	Patrick Engineering, Quarterly Groundwater Monitoring Results-First Quarter 2012-Joliet 29 Generating Station-Amended (May 11, 2012)
3253	3644	ENSR Consulting, <i>Phase II Environmental Site Assessment of the ComEd Powerton Generating Station, Route 29 & Mantino Road, Pekin, Illinois</i> , (1998)
3872	3910	2011 Q2 Groundwater Monitoring Report- bypass cleaning basin. Also 39999-40004. Also Patrick Engineering, Quarterly Groundwater Monitoring Results - Second Quarter 2011 Powerton Generating Station - Bypass Cleaning Basin Bates MWG13-15_3872-3910 (Aug. 1, 2011). See also: Comp. 260-305
3995	4043	Patrick Engineering, Quarterly Groundwater Monitoring Results-First Quarterly Report 2012-Powerton Generating Station (May 11, 2012)
4600	4689	Patrick Engineering, Quarterly Groundwater Monitoring Results-First Quarter 2012-Revisions to Original Report Submitted May 11, 2012 (July 30, 2012)
4784	4820	Bi-Monthly Groundwater Monitoring Results- February, Powerton Generating Station - Metal Cleaning Basin, Feb. 2011 (See also Bates

		Comp. 55-92)
5093	5136	Waukegan ELUC, Annual Groundwater Monitoring Report--July 2012
5328	5383	Patrick Engineering, Quarterly Groundwater Monitoring Results-First Quarter 2012-Revisions to Original Report Submitted May 11, 2012 (July 30, 2012)
5384	5428	Patrick Engineering, Quarterly Groundwater Monitoring Results-First Quarter 2012 (May 11, 2012)
5699	6039	ENSR Consulting, <i>Phase II Environmental Site Assessment of the ComEd Will County Generating Station</i> , (1998)
6301	6355	Quarterly Groundwater Monitoring Results-First Quarter 2012-Will County Generating Station-Ash Impoundments (May 11, 2012)
6435	6504	Quarterly Groundwater Monitoring Results-First Quarter 2012-Revisions to Original Report Submitted May 11, 2012, Will County Generating Station-Ash Impoundments (July 30, 2012)
6964	7080	Patrick Engineering, <i>Joliet Patrick Hydrogeological Assessment Report</i> , (2011)
7081	7147	Patrick Engineering, <i>Powerton Hydrogeologic Assessment Report</i> , (Feb. 2011)
7148	7229	Patrick Engineering, <i>Hydrogeological Assessment Report -- Waukegan</i> , 2011
7230	7340	Patrick Engineering, <i>Hydrogeological Assessment Report -- Will County</i> , (2011)
8502	8536	ENSR, <i>Phase I Environmental Site Assessment of the ComEd Powerton Generating Station</i> , (1998)
10640	10658	Patrick Engineering, <i>Monitoring Well Completion Reports for Powerton Ash Pond Assessments</i> , (October 20, 2010)
10759	10771	Patrick Engineering, <i>Proposal for Ash Pond Investigation</i> , (Aug. 18, 2010)
11798	11819	URS Corp, Annual Groundwater Monitoring Report – July 2014, Environmental Land Use Control Implementation, Midwest Generation Waukegan Generating Station (July 14, 2014)
11820	11841	URS Corp, Annual Groundwater Monitoring Report – June 2011, Environmental Land Use Control Implementation, Midwest Generation Waukegan Generating Station (July 25, 2011)
11842	11864	URS Corp, Annual Groundwater Monitoring Report – July 2010, Environmental Land Use Control Implementation, Midwest Generation Waukegan Generating Station (Aug. 4, 2010)
11865	11884	URS Corp, Annual Groundwater Monitoring Report – June 2009, Environmental Land Use Control Implementation, Midwest Generation Waukegan Generating Station (July 2, 2009)
11885	11904	URS Corp, Annual Groundwater Monitoring Report – June 2008, Environmental Land Use Control Implementation, Midwest Generation Waukegan Generating Station (July 7, 2008)

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11905	11923	RETEC, Semiannual Groundwater Monitoring Report-June 2005, Environmental Land Use Control Implementation, Waukegan Generating Station (June 30, 2005)
11924	11954	RETEC, Semiannual Groundwater Monitoring Report-December 2003, Environmental Land Use Control Implementation, Waukegan Generating Station (Jan. 16, 2004)
11966	12040	ENSR, <i>Phase I Environmental Site Assessment of the ComEd Waukegan Generating Station</i> , (Oct. 1998)
12846	12849	North Antelope Mine Coal Specifications
13734	13736	Email from Eric J. Tlachac to Maria Race (Oct. 24, 2007)
13737	13742	Email Exchange Re "Will County South Ash Pond Liner Design Status"
13746	13746	Email from Jeffrey Shuh to Maria Race
14096	14101	Email Exchange Re "Data tables for Ash Pond Investigations"
14225	14269	Email from Richard Frenndt to Maria Race Aug. 9, 2012)
14783	14785	Email from Xinying Wang to Richard Frenndt (July 25, 2012), cc'ing Maria Race, who forwarded to Richard Gnat
15199	15238	Letter from Susan Franzetti, Counsel for Midwest Generation, Nijman Franzetti LLP to Illinois EPA, Division of Public Water Supplies re Violation Notice-Waukegan (Sept. 4, 2012)
15552	15609	Quarterly Monitoring Results First Quarter, 2014, Waukegan Generating Station
15756	15836	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter 2012, Will County Generating Station – Ash Impoundments (Jan. 15, 2013)
16277	16278	Email from Bill Buscher at IEPA to Maria Race (Oct. 26, 2011)
16427	16489	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2013 Waukegan Generating Station- Ash Impoundments. See also: Bates Comp. 002226-002289 (Apr. 25, 2013)
16491	16560	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2013 Joliet #29 Generating Station-Ash Impoundments. See also: Bates Comp. 002157-002225 (Apr. 25, 2013)
16564	16564	Letter from William E. Buscher, Manager, Hydrogeology and Compliance Unit, Groundwater Section, Bureau of Water, IEPA to John Kennedy, Senior Vice President, Generation (Jul. 2, 2013)
16568	16684	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter Report 2013, Powerton Generating Station – Ash Impoundment. See also: Bates Comp. 002290-002405 (Apr. 26, 2013)
17183	17183	Letter from William E. Buscher, Manager, Hydrogeology and Compliance Unit, Groundwater Section, Bureau of Water, IEPA to Amy Hanrahan, Senior Environmental Manager, MWG (Aug. 8, 2013)

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17185	17229	Midwest Generation, <i>Compliance Commitment Agreement—Groundwater Management Zone Application—Joliet #29 Generating Station</i> , (Jan. 18. 2013)
18445	18446	Leak Location Services, Inc., <i>Report for "Electronic Leak Location Survey for Ash Impoundment 2 at the Midwest Generation Joliet Station,"</i> , (June 2, 2008)
21359	21360	Email Exchange Re "IEPA visit letter and phone conversations for Powerton" (Sept. 5, 2012)
21361	21367	Email from Maria Race to William Gaynor (Oct. 19, 2012)
21746	21750	Letter from Amy Hanrahan to Andrea Rhodes, Illinois EPA, Well Installation Documentation, Powerton (Dec. 14, 2012)
21909	21938	DRAFT Quarterly Groundwater Monitoring Results, Second Quarter 2011, Powerton
23301	23597	ENSR, Phase II Environmental Site Assessment for Joliet 29 (Dec. 1998).
23608	23617	NRT, Technical Memorandum No. 1, Impoundment Ranking and Replacement Liner Recommendations (Dec. 1, 2005).
23618	23629	NRT, Technical Memorandum No. 3, Impoundment Liner Upgrade Priority, and Liner System Options and Cost (Oct. 13, 2006).
23630	23647	NRT, Technical Memorandum No. 3, Impoundment Liner Upgrade Priority, and Liner System Options and Cost (Nov. 22, 2006).
23648	23654	Letter from Bruce R. Henset, NRT, to Maria Race re: Conceptual Design for Surface Impoundment Liners (Dec. 21, 2005).
23977	23977	Letter from William E. Buscher, IEPA, to John Kennedy, re: Approval of Powerton GMW (10/3/2013).
24577	24617	Groundwater Monitoring Report, Waukegan, First Quarter 2011.
25139	25167	ENSR, Phase I Environmental Site Assessment for Joliet 29 (Oct. 1998).
25369	25372	Letter from Elsie Briette to Dave Cohn re: Abandoned Ash Landfill Area at Joliet 29 (4/20/1995).
25474	25528	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 Joliet #29 Generating Station- Ash Impoundment (May 11, 2012) AMENDED JULY 2012 (See also Bates Comp. 000860-000914)
25694	25753	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2012, Will County Generating Station – Ash Impoundments Bates MWG-13-15_25694-25753 (Aug. 16, 2012)
29832	29836	Letter from John Ortiz, Leak Location Services, Inc., to Craig Holthaus, Otto Baum Company, Inc., re: leak location survey at Powerton (3/21/2011).
33867	33997	Permit Application for South Ash Ponds 2 and 3 Liner Replacement
37324	37378	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011 Joliet #29 Generating Station- Ash Impoundment Bates See also: Comp. 000001-000054.

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37418	37443	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2012, Powerton Generating Station – Bypass Cleaning Basin (Sept. 12, 2012) (See also Bates Comp. 001509-001534)
37444	37600	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter Report 2012, Powerton Generating Station – Ash Impoundment (Jan. 11, 2013) (See also Bates Comp. 001767-001928)
37601	37670	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter 2012 Joliet #29 Generating Station- Ash Impoundments (Jan. 21, 2013) (See also Bates Comp. 002001-002070)
37979	37980	IEPA Meeting minutes, Maria Race in attendance, 5/5/2010.
37981	37983	Patrick Engineering, IEPA meeting minutes, Maria Race in attendance, 5/5/2010.
38281	38332	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2011 Joliet #29 Generating Station- Ash Impoundment (Oct. 21, 2011) (See also Bates Comp. 000398-000449)
38524	38600	Patrick Engineering, Quarterly Groundwater Monitoring Results – Annual Report 2011 Joliet #29 Generating Station- Ash Impoundment (Mar. 5, 2012) (See also Bates Comp. 000667-000741)
38735	38806	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012 Joliet 29 Generating Station - Ash Impoundments (July 30, 2012) (See also Bates Comp. 001060-001131)
38807	38863	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2012 Joliet #29 Generating Station- Ash Impoundments (Aug. 16, 2012) (See also Bates Comp. 001348-001409)
38864	38925	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2012 Joliet #29 Generating Station- Ash Impoundments (Nov. 9, 2012)
39530	39619	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012, Powerton Generating Station – Ash Impoundment (July. 30, 2012) (See also Bates Comp. 001132-001221)
39620	39646	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Ash Impoundment (Apr. 18, 2011)
39647	39675	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011, Powerton Generating Station – Ash Impoundment (Aug. 1, 2011)
39676	39707	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2011, Powerton Generating Station – Ash Impoundment (Oct. 21, 2011) (See also Bates Comp. Bates 000450-000482)
39760	39826	Patrick Engineering, <i>Hydrogeological Assessment Report -- Powerton Station, 2011</i>

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39844	39892	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 Powerton Generating Station- Ash Impoundment (May 11, 2012) (See also Bates Comp. 000915-000963)
39893	39951	Groundwater Monitoring Report, Powerton, First Quarter 2012 amended (2012)
39952	39990	Patrick Engineering Inc., Quarterly Groundwater Monitoring Results, First Quarter 2012, Powerton Generating Station –Bypass Cleaning Basin (See also Bates Comp. 4044-4082)
39991	39998	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin See also: Comp. 000093-000130 (May 13, 2011)
40005	40044	Patrick Engineering Inc., Quarterly Groundwater Monitoring Results, Third Quarter 2011, Powerton Generating Station –Bypass Cleaning Basin (See also Bates Comp. 4088-4127)
40045	40104	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin (Jan. 18, 2012) (See also Bates Comp. 000626-000666)
40045	40104	Groundwater Monitoring Report, Powerton Bypass Cleaning Basin, Fourth Quarter 2011
40346	40396	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarterly Report 2012, Powerton Generating Station – Ash Impoundment (Aug. 16, 2012) (See also Bates Comp. 001410-001460)
40397	40454	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter Report 2012, Powerton Generating Station – Ash Impoundment (Nov. 9, 2012) (See also Bates Comp. 001535-001594)
40505	40548	Patrick Engineering, Bi-Monthly Groundwater Monitoring Results-- February 2011 Powerton Generating Station-Metal Cleaning Basin. (May 13, 2011) See also: Bates Comp. 000055-000092
40589	40629	Patrick Engineering, Groundwater Monitoring Results – April 2012, Powerton Generating Station – Metal Cleaning Basin (May 17, 2012) (See also Bates Comp. 001019-001059)
40630	40670	Patrick Engineering, Bi-Monthly Groundwater Monitoring Results – December 2011, Powerton Generating Station – Metal Cleaning Basin Bates. (Jan. 17, 2012). See also: Comp. 000585-000625
40671	40710	Patrick Engineering, Bi-Monthly Groundwater Monitoring Results – October 2011, Powerton Generating Station – Metal Cleaning Basin. (Dec. 14, 2012) See also: Bates Comp. 001727-001766
41192	41193	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2011, Powerton Generating Station – Ash Impoundment (Oct. 21, 2011) MISSING PAGE (See 41192-41193; see also Bates Comp. Bates 000450-000482)

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41192	41193	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2011, Powerton Generating Station – Ash Impoundment (Oct. 21, 2011) MISSING PAGE (See 41192-41193; see also Bates Comp. Bates 000450-000482)
41252	41296	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2011 Waukegan Generating Station- Ash Impoundment (Oct. 21, 2011) (See also Bates Comp. 000539-000584)
41297	41378	Patrick Engineering, Hydrogeologic Assessment Report for Waukegan Generating Station (Feb. 2011).
41395	41439	Groundwater Monitoring Report, Waukegan, First Quarter 20112 amended (2012)
41609	41671	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter 2012 Waukegan Generating Station- Ash Impoundments (Jan. 16, 2013) (See also Bates Comp. 001929-002000)
41672	41742	Patrick Engineering, Quarterly Groundwater Monitoring Results – Annual Report 2011 Waukegan Generating Station- Ash Impoundment (Mar. 5, 2012) (See also Bates Comp. 000794-000859)
41735	41744	Patrick Engineering, Ash Pond Data Evaluation & Summary. Waukegan Station, May 2012 (including two draft versions and one final version).
41743	41798	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012 Waukegan Generating Station - Ash Impoundments (July 30, 2012) (See also Bates Comp. 001222-001277)
41743	41798	Groundwater Monitoring Report, Waukegan, First Quarter 2012 amended (2012)
41799	41846	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2012 Waukegan Generating Station- Ash Impoundment (Aug. 16, 2012) (See also Bates Comp. 001461-001508)
41799	41846	Groundwater Monitoring Report, Waukegan, Second Quarter 2012 (2012)
41847	41898	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2012 Waukegan Generating Station- Ash Impoundment (Nov. 9, 2012) (See also Bates Comp. 001595-001646)
42296	42344	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011, Will County Generating Station – Ash Impoundment (Apr. 18, 2011)
42345	42394	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011, Will County Generating Station – Ash Impoundment (Aug. 1, 2011) (See also Bates Comp. 000348-000397)
42395	42450	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2011, Will County Generating Station – Ash Impoundment (Oct. 21, 2011) (See also Bates Comp. 000483-000538)

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42570	42624	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012, Will County Generating Station – Ash Impoundment (May 11, 2012) (See also Bates Comp. 000964-001018)
42706	42781	Groundwater Monitoring Report, Will County, 2011 annual (2011)
42782	42865	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2013, Will County Generating Station – Ash Impoundments (Apr. 29, 2013) (See also Bates Comp. 002071-002156)
42866	42935	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 – AMENDED Revisions to Original Report Submitted May 11, 2012 Will County (July 30, 2012) (See also Bates Comp. 001278-001347)
42866	42935	Groundwater Monitoring Report, Wil County, 2012 Q2 amended (2012)
42996	43084	Patrick Engineering, Quarterly Groundwater Monitoring Results – Third Quarter 2012, Will County Generating Station – Ash Impoundments. (Nov. 9, 2012). See also: Bates Comp. 001647-001726
44125	44146	Waukegan ELUC, Annual Groundwater Monitoring Report--July 2014
44125	44146	Waukegan ELUC, Annual Groundwater Monitoring Report--July 2014
44279	44279	Email from James DiCola to Maria Race re Pond 3 (Aug 23, 2012)
44558	44583	Email Exchange Re: "Ash Impundment Project (Groundwater Monitoring Well Installations)
44615	44617	Email from Maria Race to Lynn Dunaway (Aug. 28, 2014)
45779	46054	ENSR Phase II Environmental Site Assessment Waukegan Generating Station
46055	46076	Waukegan ELUC report, June 27, 2007
46077	46093	RETEC, Semiannual Groundwater Monitoring Report-June 2006, Waukegan Environmental Land Use Control Implementation (June 26, 2006)
46094	46112	RETEC, Semiannual Groundwater Monitoring Report-December 2005, Waukegan Environmental Land Use Control Implementation (June 26, 2006)
46113	46122	Andrews Environmental Engineering, Inc., <i>Former Griess Pfleger Tannery Site</i> , (Nov. 8, 2005)
46123	46139	RETEC, Semiannual Groundwater Monitoring Report-June 2005, Waukegan Environmental Land Use Control Implementation (June 30, 2005)
46140	46163	June 2004 ELUC groundwater report
46164	46193	Waukegan ELUC, Annual Groundwater Monitoring Report--December 2003
46194	46210	Waukegan ELUC report, June 6, 2002
48440	48492	ENSR, Phase II Environmental Site Assessment for Joliet 29 Station (Dec. 7, 1998)

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51503	51525	URS, Annual Groundwater Monitoring Report-July 2013, Environmental Landu Use Control Implementation, Waukegan (July 19, 2013)
51557	51573	
54258	54259	Letter from Maria Race to IEPA re Waukegan CCA (Oct. 22, 2013)
59603	59693	Geosyntech, Waukegan History of Construction, East and West Ash Basins (October 2016)
9668	9731	Midwest Generation, <i>Application for Permit or Construction Approval, Secondary Ash Settling Basin Liner Replacement -- Powerton Station</i> , (Dec. 22, 2009)
61443	61552	Waukegan ELUC data, 3/18, 5/18, and 9/13 2016
14157	14173	Email from Richard Frendt to Maria Race (Feb. 10, 2012)

Midwest Generation, LLC's Response to Complainants' Fourth Set of Document Requests, Second Set of Interrogatories, and Second Set of Requests for Admission to Respondents (Mar. 31, 2015)
Midwest Generation, LLC's Supplemental Response to Complainants' Second Set of Interrogatories (June 10, 2015)
Midwest Generation, LLC's Supplemental Response to Third Requests for Admission to Respondents (June 10, 2015)
MWG's Supplemental Response to Complainants' First set of Interrogatories (Jun 10, 2015). Contains detailed response to interrogatory 7 signed by Race
None Given
Race Dep. Tr.

Dated: October 6, 2017

Respectfully Submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing Notice of Electronic filing and **COMPLAINANTS' WITNESS SPECIFIC EXHIBIT LISTS** was filed electronically on October 6, 2017 and served via electronic mail on October 6, 2017 on the parties listed on the following Service List.

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