

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.)
)
 MIDWEST GENERATION, LLC,)
)
 Respondents)

PCB No-2013-015
(Enforcement – Water)

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **COMPLAINANTS' EXHIBITS OFFERED AT HEARING**, copies of which are served on you along with this notice.

Respectfully submitted,



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

Dated: October 31, 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)	

COMPLAINANTS' EXHIBITS OFFERED AT HEARING

The following exhibits were either admitted into evidence or were accepted as an offer of proof during the October 23-October 27, 2017 hearing in PCB No. 2013-15.

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Maria Race

Ex#	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 1A	MWG13-15	328	332	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Waukegan Generating Station, (June 11, 2012)	Y
Comp. Ex. 2A	MWG13-15	333	341	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Will County Generating Station, (June 11, 2012)	Y
Comp. Ex. 3A	MWG13-15	342	347	Joliet Notice of Violation (June 11, 2012)	Y

Comp. Ex. 4A	MWG13-15	348	358	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Powerton Generating Station, (June 11, 2012)	Y
Comp. Ex. 5	Interrogatory			MWG's Response to Complainants Fourth Set of Document Requests, Second Set of Interrogatories, and Second Set of Requests for Admission to Respondents (excerpt)(Mar. 31, 2015)	Y
Comp. Ex. 6	Interrogatory			MWG's Supplemental Response to Complainants Second Set of Interrogatories (June. 10, 2015)	Y
Comp. Ex. 6.5	Interrogatory			MWG's Supplemental Response to Complainants Second Set of Interrogatories (June. 10, 2015)	Y
Comp. Ex. 7	Interrogatory			MWG's Supplemental Response to Complainants First Set of Interrogatories	Y
Comp. Ex. 8B	MWG13-15	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	Y
Comp. Ex. 9B	MWG13-15	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	Y
Comp. Ex. 10B	MWG13-15	407	420	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice	Y

				--MWG response to the Waukegan NOV, Jul. 27, 2012	
Comp. Ex. 11B	MWG13-15	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	Y
Comp. Ex. 12C	MWG13-15	6964	7080	Patrick Engineering, Joliet Patrick Hydrogeological Assessment Report, (2011)	Y
Comp. Ex. 13C	MWG13-15	7081	7147	Patrick Engineering, Powerton Hydrogeologic Assessment Report, (Feb. 2011)	Y
Comp. Ex. 14C	MWG13-15	7148	7229	Patrick Engineering, Hydrogeological Assessment Report -- Waukegan, 2011	Y
Comp. Ex. 15C	MWG13-15	7230	7340	Patrick Engineering, Hydrogeological Assessment Report -- Will County, (2011)	Y
Comp Ex. 16	MWG13-15	14157	14173	Email from Richard Frenndt to Maria Race (Feb. 10, 2012)	Y
Comp. Ex. 17D	MWG13-15	3253	3644	ENSR Consulting, Phase II Environmental Site Assessment of the ComEd Powerton Generating Station, Route 29 & Mantino Road, Pekin, Illinois, (1998)	Y
Comp. Ex. 18D	MWG13-15	5699	6039	ENSR Consulting, Phase II Environmental Site Assessment of the ComEd Will County Generating Station, (1998)	Y
Comp. Ex. 19D	MWG13-15	45779	46054	ENSR Phase II Environmental Site Assessment Waukegan Generating Station (as an ancient document)	Y
Comp. Ex. 20D	MWG13-15	23301	23597	ENSR, Phase II Environmental Site Assessment for Joliet 29 (Dec. 1998).	Y

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Comp. Ex. 21	MWG13-15	25139	25167	ENSR, Phase I Environmental Site Assessment for Joliet 29 (Oct. 1998).	Offer of Proof
Comp. Ex. 22	MWG13-15	13734	13736	Email from Eric J. Tlachac to Maria Race (Oct. 24. 2007)	Y
Comp. Ex. 23	MWG13-15	21746	21750	Letter from Amy Hanrahan to Andrea Rhodes, Illinois EPA, Well Installation Documentation, Powerton (Dec. 14, 2012)	Y
Comp. Ex. 24E	MWG13-15	4044	4082	Powerton Bypass Cleaning Basin, 2012 quarter 1	Y
Comp. Ex. 24.5	MWG13-15	39530	39675	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 Powerton Generating Station- Ash Impoundment (July 30, 2012)	Y
Comp. Ex. 25E	MWG13-15	38471	38523	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011 Joliet #29 Generating Station- Ash Impoundment Bates Comp. 000131-000183 (Aug. 1, 2011)	Y
Comp. Ex. 26E	MWG13-15	39620	39646	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Ash Impoundment (Apr. 18, 2011)	Y
Comp. Ex. 27E	MWG13-15	40005	40044	Patrick Engineering Inc., Quarterly Groundwater Monitoring Results, Third Quarter 2011, Powerton Generating Station –Bypass Cleaning Basin (See also Bates Comp. 4088-4127)	Y
Comp. Ex. 28E	MWG13-15	40589	40629	Patrick Engineering, Groundwater Monitoring Results – April 2012, Powerton Generating Station – Metal Cleaning Basin (May 17, 2012) (See also Bates Comp. 001019-001059)	Y

Comp. Ex. 29E	MWG13-15	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)	Y
Comp. Ex. 30E	MWG13-15	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)	Y
Comp. Ex. 30.5E	MWG13-15	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)	Y
Comp. Ex. 31	MWG13-15	14225	14269	Email from Richard Frenedt to Maria Race Aug. 9, 2012)	Y
Comp. Ex. 32	MWG13-15	13746	13746	Email from Jeffrey Shuh to Maria Race	Y
Comp. Ex. 33	MWG13-15	9668	9731	Midwest Generation, Application for Permit or Construction Approval, Secondary Ash Settling Basin Liner Replacement -- Powerton Station, (Dec. 22, 2009)	Y
Comp. Ex. 34	MWG13-15	23608	23617	NRT, Technical Memorandum No. 1, Impoundment Ranking and Replacement Liner Recommendations (Dec. 1, 2005).	Y
Comp. Ex. 35	MWG13-15	16277	16278	Email from Bill Buscher at IEPA to Maria Race (Oct. 26, 2011)	Offer of Proof
Comp. Ex. 36	MWG13-15	14096	14101	Email Exchange Re "Data tables for Ash Pond	Y

				Investigations"	
Comp. Ex. 37	MWG13-15	818	819	Unsigned Letter from Maria Race to Lynn Dunaway	Offer of Proof
Comp. Ex. 38	MWG13-15	12003	12040	ENSR, Phase I Environmental Site Assessment of the ComEd Waukegan Generating Station, (Oct. 1998)	Y
Comp. Ex. 39F	MWG13-15	5114	5136	Waukegan ELUC, Annual Groundwater Monitoring Report--July 2013	Y
Comp. Ex. 40F	MWG13-15	11924	11954	RETEC, Semiannual Groundwater Monitoring Report-December 2003, Environmental Land Use Control Implementation, Waukegan Generating Station (Jan. 16, 2004)	Y
Comp. Ex. 41F	MWG13-15	46113	46122	Andrews Environmental Engineering, Inc., Former Griess Pflieger Tannery Site, (Nov. 8, 2005)	Y
Comp. Ex. 42F	MWG13-15	46194	46201	Waukegan ELUC report, June 6, 2002	Y
Comp. Ex. 43	MWG13-15	44982		Email from Maria Race about Waukegan (July 26. 2017)	Y
Comp. Ex. 44	MWG13-15	44615	44617	Email from Maria Race to Lynn Dunaway (Aug. 28, 2014)	Y
Comp. Ex. 45	MWG13-15	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).	Offer of Proof
Comp. Ex. 46	MWG13-15	37981	37983	Patrick Engineering, IEPA meeting minutes, Maria Race in attendance, 5/5/2010.	Y
Comp. Ex. 47	MWG13-15	37979	37980	IEPA Meeting minutes, Maria Race in attendance, 5/5/2010.	Offer or Proof
Comp. Ex. 48	MWG13-15	13737	13742	Email Exchange Re "Will County South Ash Pond Liner Design Status"	Y

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Christopher Lux

Exhibit #	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 100	MWG13-15	49272	49285	Letter from Michael Smith to Christopher Lux (May 29, 2015)	Y
Comp. Ex. 102	MWG13-15	11572	11577	2007 work order to excavate and clean East Ash Pond to expose liner for repair	Y
Comp. Ex. 103	MWG13-15	44621	44621	Email, from C. Lux to Wayne Ollila (Oct. 30, 2014)	Y
Comp. Ex. 104	MWG13-15	44623	44623	Email from Chris Lux to Mike Smith (May 27, 2014)	Y
Comp. Ex. 105	MWG13-15	49286	49292	Email Exchange Re: NRG Waukegan Station West & East Ash Pond Liner Repairs (Mar. 21, 2015)	Y
Comp. Ex. 106	MWG13-15	44588	44589	Email about Ash Dumping on Station Property, (Sept. 12, 2014)	Y
Comp. Ex. 107	MWG13-15	22023	22023	Email from William Gaynor to Amy Hanrahan and others, 4/9/2013.	Y
Comp. Ex. 108	MWG13-15	22014	22018	Email Exchange Re "Powerton Secondary Ash Basin Relining" (Mar. 27, 2013)	Y
Comp. Ex. 109	MWG13-15	22765	22766	Email from William Gaynor to Charles J Hart and others, 9/24/2013.	Y

Comp. Ex. 110	MWG13-15	28031	28034	Email from Terry Kosmatka to Christopher lux and other, 9/13/2013.	Y
Comp. Ex. 112	MWG13-15	22020	22020	Email Exchange Re Ground Water Issues (Mar. 27, 2013)	Y

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Rebecca Maddox

Exhibit #	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 300	MWG13-15	27001	27001	Email from Jeffrey Beaudry to Aron Yakima and others, 7/17/2013.	Offer of Proof
Comp. Ex. 301	MWG13-15	48566	48567	Email from Rebecca Maddox to Yvonne Dedrickson (Sept. 1, 2010)	Y
Comp. Ex. 302	MWG13-15	28849	28851	Fax from Tedd Mills, Brieser Construction, to Beckie Maddox, 10/19/2009.	Y
Comp. Ex. 303	MWG13-15	28862	28863	Stormwater Construction Site Inspection Report signed by Beckie Maddox, 10/1/2009.	Y
Comp. Ex. 304	MWG13-15	48586	48586	Email from Rebecca Maddox to John Shields and Black Connolly (July 28, 2010)	Y
Comp. Ex. 305	MWG13-15	27130	27136	Email Exchange Re: Leak Location Survey for 2S Pond at MWGen - Will County	Offer of Proof
Comp. Ex. 306	MWG13-15	48612	48612	Email from Rebecca Maddox to Christopher Lux (Sept. 3, 2008)	Y

Comp. Ex. 307	MWG13-15	14177	14181	Email Exchange Re "3S Ash Pond Liner Damage-Will County"	Y
Comp. Ex. 309	MWG13-15	29589	29590	Letter from Donald Claybaugh to IEPA re: "IEMA incident" at Will County (12/11/2008).	Y
Comp. Ex. 311	MWG13-15	48568	48569	Email from Raymond Wolan to Rebecca Maddox and Daryl Miller (July 28, 2010)	Y

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Richard Gnat

Exhibit #	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 201	MWG13-15	24264	24386	Letter from Richard Gnat, KPRG, to Maria Race re: Geotechnical Analysis of Soil Surrounding Settling Basins/Ponds (10/13/2005).	Y
Comp. Ex. 202	MWG13-15	24387	24392	Letter from Richard Gnat, KPRG, to Maria Race re: Re-Issuance of Figure 4-1 for Geotechnical Summary Report (Oct. 25,2005).	Y
Comp. Ex. 203	MWG13-15	45648	45649	KPRG Boring Logs for MWs 8 and 9, Waukegan, (April 29, 2014)	Y
Comp. Ex. 204G	MWG13-15	58593	58615	TestAmerica Analytical Report, Joliet #29 (May 31, 2016)	Y
Comp. Ex. 205G	MWG13-15	58807	58831	Joliet lab results	Y

Comp. Ex. 206G	MWG13-15	59021	59046	Joliet lab results	Y
Comp. Ex. 207G	MWG13-15	59778	59802	TestAmerica Analytical Report, Joliet# 29 (Feb. 25, 2016)	Y
Comp. Ex. 208G	MWG13-15	61575	61599	TestAmerica Analytical Reports 2017	Y
Comp. Ex. 209G	MWG13-15	61790	61813	Joliet lab results	Y
Comp. Ex. 210H	MWG13-15	58637	58675	Powerton lab results	Y
Comp. Ex. 211H	MWG13-15	58853	58893	Powerton lab results	Y
Comp. Ex. 212H	MWG13-15	59069	59107	Powerton lab results	Y
Comp. Ex. 213H	MWG13-15	59873	59909	Powerton lab results	Y
Comp. Ex. 214H	MWG13-15	61621	61662	Powerton lab results	Y
Comp. Ex. 215H	MWG13-15	61834	61873	Powerton lab results	Y
Comp. Ex. 216I	MWG13-15	45513	45538	TestAmerica Analytical Report (June 3, 2014)	Y
Comp. Ex. 217I	MWG13-15	45539	45562	Waukegan lab results	Y
Comp. Ex. 218I	MWG13-15	45592	45616	Waukegan lab results	Y
Comp. Ex. 219I	MWG13-15	62706	62725	Waukegan lab results	Y
Comp. Ex.	MWG13-15	62744	62767	Waukegan lab results	Y

220I					
Comp. Ex. 222J	MWG13-15	58705	58733	Waukegan lab results	Y
Comp. Ex. 223J	MWG13-15	58921	58949	Waukegan lab results	Y
Comp. Ex. 224J	MWG13-15	59140	59168	Waukegan lab results	Y
Comp. Ex. 225J	MWG13-15	60113	60141	Waukegan lab results	Y
Comp. Ex. 226J	MWG13-15	60168	60196	Waukegan lab results	Y
Comp. Ex. 227J	MWG13-15	61693	61719	Waukegan lab results	Y
Comp. Ex. 228J	MWG13-15	61904	61930	Waukegan lab results	Y
Comp. Ex. 229K	MWG13-15	45563	45591	Waukegan tannery ELUC lab results	Y
Comp. Ex. 230K	MWG13-15	45617	45647	Waukegan tannery ELUC lab results	Y
Comp. Ex. 231K	MWG13-15	61443	61480	Waukegan ELUC data, 3/18, 5/18, and 9/13 2016	Y
Comp. Ex. 232K	MWG13-15	61481	61518	Waukegan tannery ELUC lab results	Y
Comp. Ex. 233K	MWG13-15	61519	61552	Waukegan tannery ELUC lab results	Y
Comp. Ex. 234K	MWG13-15	62653	62682	Waukegan tannery ELUC lab results	Y
Comp. Ex. 235K	MWG13-15	62789	62816	Waukegan tannery ELUC lab results	Y
Comp. Ex.	MWG13-15	61411	61442	TestAmerica Analytical	Y

235.5K				Report, Waukegan (Dec. 21, 2016)	
Comp. Ex. 236L	MWG13-15	58759	58783	Will County lab results	Y
Comp. Ex. 237L	MWG13-15	58973	58998	Will County lab results	Y
Comp. Ex. 238L	MWG13-15	59193	59217	Will County lab results	Y
Comp. Ex. 239L	MWG13-15	60015	60039	Will County lab results	Y
Comp. Ex. 240L	MWG13-15	61744	61767	Will County lab results	Y
Comp. Ex. 241L	MWG13-15	61955	61979	Will County lab results	Y
Comp. Ex. 242	MWG13-15	667	711	CCA - GMZ Application - Joliet	Y
Comp. Ex. 243M	Comp.	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)	Y
Comp. Ex. 244M	MWG13-15	49775	49838	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015 Joliet #29 Generating Station – Ash Impoundments (July 22, 2015)	Y
Comp. Ex. 245M	MWG13-15	58292	58388	NRG, Annual and Quarterly Groundwater Monitoring Report - Joliet #29 Generating Station, 4th	Y

				Quarter 2016 (Jan. 13, 2017)	
Comp. Ex. 246M	MWG13-15	62322	62386	Joliet groundwater report, April 2017	Y
Comp. Ex. 248N	MWG13-15	19442	19444	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2009, (Aug. 27, 2009)	Y
Comp. Ex. 249N	MWG13-15	19455	19459	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2010 (Aug. 27, 2010)	Y
Comp. Ex. 250N	MWG13-15	44153	44155	Letter from Richard Gnat to James DiCola, Inspection Summary Letter Aug. 22, 2011)	Y
Comp. Ex. 251N	MWG13-15	19470	19473	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2012, (Sept. 19, 2012)	Y
Comp. Ex. 253	MWG13-15	712	723	MWG Powerton ELUC Application, CCA	Y
Comp. Ex. 254	MWG13-15	724	775	CCA - GMZ Application - Powerton	Y
Comp. Ex. 255	MWG13-15	11235	11237	Letter from Richard Gnat to Lynn Dunaway, IEPA, Powerton Generating Station (Sept. 11, 2013)	Y
Comp. Ex. 256O	MWG13-15	4170	4323	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Powerton Generating Station – Ash Impoundments. See also:	Y

				Bates Comp. 002563-002716 (July 22, 2013)	
Comp. Ex. 2570	MWG13-15	49839	49966	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Powerton Generating Station – Ash Impoundments(July 22, 2015)	Y
Comp. Ex. 2580	MWG13-15	58155	58291	NRG, Annual and Quarterly Groundwater Monitoring Report - Powerton Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Y
Comp. Ex. 2590	MWG13-15	62216	62321	Powerton groundwater report, 2017 quarter 1	Y
Comp. Ex. 2600	MWG13-15	62535	62642	Powerton groundwater report, May 2017	Y
Comp. Ex. 261	MWG13-15	58588	58592	Powerton Generating Station - Metals Cleaning Basin Quarterly Groundwater Sampling Summary - 4th Quarter 2016 (Jan. 24, 2017)	Y
Comp. Ex. 263	MWG13-15	599	610	MWG Waukegan ELUC Application, CCA	Y
Comp. Ex. 264	MWG13-15	14522	14544	Waukegan Station New Wells and ELUC Information	Y
Comp. Ex. 265	MWG13-15	48439	48439	Table 1. Groundwater Elevations - Midwest Generation, LLC, Waukegan Station, Waukegan, IL Bates MWG13-15_48439	Offer of Proof

Comp. Ex. 267P	MWG13-15	43695	43848	Groundwater Monitoring Report, Waukegan, Third Quarter 2014 (2014)	Y
Comp. Ex. 268P	MWG13-15	45328	45416	NRG Energy, Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Waukegan Generating Station – Ash Impoundments (Jan. 22, 2015)	Y
Comp. Ex. 269P	MWG13-15	58490	58582	NRG, Annual and Quarterly Groundwater Monitoring Report - Waukegan Generating Station, 4th Quarter 2016 (Jan. 19, 2017)	Y
Comp. Ex. 270P	MWG13-15	62387	62468	Waukegan groundwater report, May 2017	Y
Comp. Ex. 271	MWG13-15	43849	43857	Groundwater data tables for Waukegan Wells MW-1 through MW-15 (various date ranges)	Y
Comp. Ex. 272	MWG13-15	56632	56638	Draft Groundwater Analytical Results, Waukegan	Y
Comp. Ex. 274	MWG13-15	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) [Incomplete letter but attachments]	Y

Comp. Ex. 275	MWG13-15	594	598	Midwest Generation, Compliance Commitment Agreement-Well Installation Documentation, Waukegan Station, (Jan 15, 2013)	Y
Comp. Ex. 276	MWG13-15	622	666	CCA - GMZ Application - Will County	Y
Comp. Ex. 277	MWG13-15	613	621	MWG Will County ELUC Application, CCA	Y
Comp. Ex. 278Q	MWG13-15	6670	6745	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Will County Generating Station – Ash Impoundments. Also: Bates Comp. 002773-002838 (July 22, 2013)	Y
Comp. Ex. 279Q	MWG13-15	49967	50028	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Will County Generating Station – Ash Impoundments (July 22, 2015)	Y
Comp. Ex. 280Q	MWG13-15	58389	58489	NRG, Annual and Quarterly Groundwater Monitoring Report - Will County Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Y
Comp. Ex. 281Q	MWG13-15	62469	62534	Will County groundwater report, May 2017	Y
Comp. Ex. 284	MWG13-15	49565	49652	KPRG, CCB Determination Support, Midwest Generation Will County Station (Sept. 8, 2015)	Y

Comp. Ex. 286	MWG13-15	14744	14747	Midland Standard Engineering & Testing, Inc., Laboratory Testing Services-Will County station (Aug. 22, 2012)	Y
Comp. Ex. 296	MWG13-15	44557	44557	Email from James DiCola to Richard Gnat re Ash Burial Area (Sept. 15, 2010)	Y

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Dr. James Kunkel

Ex#	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 400				James Kunkel Resume/CV	Y
Comp. Ex. 401				James Kunkel expert reports: 7/1/15	Y
Comp. Ex. 403	Comp.	17473		EPRI 2012	Offer of Proof
Comp. Ex. 404	Comp.	17321	17472	EPRI 2010	Y
Comp. Ex. 405	Comp.	19067	19115	Illinois EPA technical support document (2013)	Y
Comp. Ex. 407				James Kunkel expert reports 12/8/2015	Y
Comp. Ex. 408				James Kunkel expert reports 3/16/16	Y
Comp. Ex. 409				ASTM D3987-85 (1985)	Offer of Proof
Comp. Ex. 410				ASTM D3987-12	Offer of Proof
Comp. Ex. 411				James Kunkel Demonstrative Exhibits	Y

Respectfully submitted,



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Attorney for CARE

Dated: October 31, 2017

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **COMPLAINANTS' EXHIBITS OFFERED AT HEARING** was served electronically to all parties of record listed below, on October 31, 2017.

Respectfully submitted,



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