

**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  
Illinois Pollution Control Board  
100 West Randolph St  
Suite 11-500  
Chicago, IL 60601

Attached Service List

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached documents:

- **ADDITIONAL ITEMS ON WHICH EXPERTS INTEND TO RELY FROM SUPPLEMENTAL FACT DISCOVERY**
- **GROUNDWATER MONITORING REPORTS AND FIGURES RELIED UPON IN DR. JAMES KUNKEL'S EXPERT REPORTS**
- **COMPLAINANTS' DRAFT EXHIBIT LIST**
- **COMPLAINANTS' WITNESS LIST AND PROPOSED ORDER OF WITNESSES**
- **CERTIFICATE OF SERVICE**

Respectfully submitted,



Lindsay Dubin

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Chicago, IL 60601  
ldubin@elpc.org  
ph (312) 795-3712

Dated: May 11, 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	)	
ENVIRONMENT	)	
	)	
Complainants,	)	
	)	
v.	)	PCB No-2013-015
	)	(Enforcement – Water)
MIDWEST GENERATION, LLC,	)	
	)	
Respondents	)	

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**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)

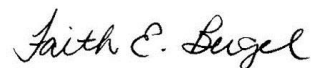
NRG Energy, *Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2016, Will County Generating Station – Ash Impoundments* Bates MWG-13-15\_58389-58489 (Jan. 13, 2017)

**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,



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*Attorney for Sierra Club*



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312-726-5206 (fax)

Dated: April 27, 2017

*Attorney for CARE*

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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LAW AND POLICY CENTER,	)	
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CITIZENS AGAINST RUINING THE	)	
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	)	
Complainants,	)	
	)	
v.	)	PCB No-2013-015
	)	(Enforcement – Water)
MIDWEST GENERATION, LLC,	)	
	)	
Respondents	)	

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**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 5/11/2017

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,

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Dated: April 27, 2017

*Attorney for CARE*

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

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**COMPLAINANTS' DRAFT EXHIBIT LIST**

Consistent with the May 1, 2017 deadline delineated in the April 11, 2017 PCB 2013-15 Hearing Officer Order, Complainants' draft exhibit list is as follows:

Comp.	1	-	54
Comp.	55	-	92
Comp.	55	-	92
Comp.	93	-	130
Comp.	131	-	183
Comp.	184	-	219
Comp.	220	-	259
Comp.	260	-	305
Comp.	306	-	347
Comp.	348	-	397
Comp.	398	-	449
Comp.	450	-	482
Comp.	483	-	538
Comp.	539	-	584
Comp.	585	-	625
Comp.	626	-	666
Comp.	667	-	741
Comp.	742	-	793
Comp.	794	-	859
Comp.	860	-	914

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Comp.	915	-	963
Comp.	964	-	1018
Comp.	1019	-	1059
Comp.	1060	-	1131
Comp.	1132	-	1221
Comp.	1222	-	1277
Comp.	1278	-	1347
Comp.	1348	-	1409
Comp.	1410	-	1460
Comp.	1461	-	1508
Comp.	1509	-	1534
Comp.	1535	-	1594
Comp.	1595	-	1646
Comp.	1647	-	1726
Comp.	1727	-	1766
Comp.	1767	-	1928
Comp.	1929	-	2000
Comp.	2001	-	2070
Comp.	2071	-	2156
Comp.	2157	-	2225
Comp.	2226	-	2289
Comp.	2290	-	2405
Comp.	2406	-	2474
Comp.	2475	-	2562
Comp.	2563	-	2716
Comp.	2717	-	2772
Comp.	2773	-	2838
Comp.	2839	-	2901
Comp.	2902	-	3027
Comp.	3028	-	3087
Comp.	3088	-	3151
Comp.	3152	-	3301
Comp.	3302	-	3389
Comp.	3390	-	3485
Comp.	3390	-	3485
Comp.	3487	-	3609
Comp.	3610	-	3683
Comp.	3684	-	3775
Comp.	3776	-	3886
Comp.	3887	-	3922
Comp.	3957	-	4596
Comp.	5526	-	5545
Comp.	9168	-	9624

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Electronic Filing: Received, Clerk's Office 5/11/2017

Comp.	9564	-	9579
Comp.	9580	-	9585
Comp.	9610	-	9617
Comp.	17321	-	17472
Comp.	17473		
Comp.	17474	-	17476
Comp.	17477	-	17685
Comp.	18103	-	18847
Comp.	18938	-	18970
Comp.	18971	-	18981
Comp.	18982	-	19014
Comp.	19015	-	19041
Comp.	19042	-	19061
Comp.	19062	-	19066
Comp.	21738	-	21748
Comp.	21826	-	22057
Comp.	41441	-	41446
Comp.	41448	-	41465
Comp.	50598	-	50735
Comp.	53532	-	53569
Comp.	53740		
Comp.	53824	-	53927
Comp.	016136	-	016544
Comp.	019067	-	019298

MWG13-15	1	-	176
MWG13-15	328	-	332
MWG13-15	333	-	341
MWG13-15	342	-	347
MWG13-15	348	-	358
MWG13-15	384	-	398
MWG13-15	421	-	432
MWG13-15	442	-	451
MWG13-15	452	-	491
MWG13-15	506	-	521
MWG13-15	523	-	529
MWG13-15	538	-	544
MWG13-15	552	-	558
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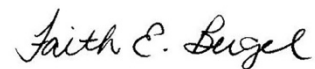
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In addition to the above bates ranges, the following documents are also incorporated into Complainants' draft exhibit list:

1. Coal Ash Basics, UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, <https://www.epa.gov/coalash/coal-ash-basics#01>.
2. DiCola Dep. Tr.
3. Expert Report of John Seymour, P.E. (Nov. 2, 2015)
4. Gilbert, R.O. 1987. Statistical Methods for Environmental Pollution Monitoring. New York: van Nostrand Reinhold. ISBN 0-442-23050-8. 320 p.
5. Gnat Dep. Tr.
6. Kelly Dep. Tr.
7. Lux Dep. Tr.
8. Maddox Dep. Tr.

9. Nádaská, G., J. Lesný and I. Michalík, 2012. Environmental Aspect of Manganese Chemistry. Hungarian Electronic Journal of Sciences: ENV-100702-A., available at <http://heja.szif.hu/ENV/ENV-100702-A/env100702a.pdf>.
10. Race Dep. Tr.
11. Seymour Dep. Tr.
12. Seymour Dep. Ex. 15
13. Seymour Dep. Ex. 2
14. Seymour Dep. Ex. 6
15. Seymour Dep. Ex. 8
16. Supplement to the Expert Report of John Seymour, P.E. (Feb. 29, 2016)
17. Terzaghi, K., Peck, R. B. and Mesri, G., 1996. Soil Mechanics in Engineering Practice, 3rd ed., John Wiley & Sons, Inc., New York, New York, available for purchase at <http://www.amazon.com/K-Terzaghis-Mechanics-Engineering-Practice-Hardcover/dp/B003WXBRP4>
18. U.S. Geological Survey. 2014a. USGS 05568500 Des Plaines River at Route 53 at Joliet, IL. [http://waterdata.usgs.gov/nwis/uv?site\\_no=05537980](http://waterdata.usgs.gov/nwis/uv?site_no=05537980)
19. Veenbaas Dep. Tr.

Respectfully submitted,



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312-726-5206 (fax)

*Attorney for CARE*

Dated: May 1, 2017

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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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	)	

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**COMPLAINANTS' WITNESS LIST AND PROPOSED ORDER OF WITNESSES**

Consistent with the May 1, 2017 deadline delineated in the April 11, 2017 PCB 2013-15 Hearing Officer Order, below is Complainants' list of witnesses whom Complainants intend to call. Complainants propose calling these witnesses in the order in which they appear below.

1. Maria Race
2. Christopher D. Lux
3. Fredrick Veenbaas
4. Rebecca Maddox
5. Mark S. Kelly
6. Richard R. Gnat
7. Dr. James R. Kunkel
8. James DiCola

Respectfully submitted,

*Faith E. Bugel*

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*Attorney for CARE*

Dated: May 1, 2017

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing Notice of Electronic filing was filed electronically on May 11, 2017 with the following:

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

And that true copies of

- **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**

were served via electronic mail on April 27, 2017 on the parties listed on the following Service List and that true copies of

- **COMPLAINANTS' DRAFT EXHIBIT LIST** and
- **COMPLAINANTS' WITNESS LIST AND PROPOSED ORDER OF WITNESSES**

were served via electronic mail on May 1, 2017 on the parties listed on the following Service List.



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Dated: May 11, 2017

**PCB 2013-015 SERVICE LIST:**

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