

**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' SUPPLEMENTAL EXHIBIT LIST FOR EACH WITNESS**, 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 20, 2017

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

**SUPPLEMENTAL EXHIBIT LIST FOR EACH WITNESS**

Complainants are supplementing their October 18, 2017 **EXHIBIT LIST FOR EACH WITNESS**, attached hereto as “Exhibit A,” with the following exhibits:

Comp./ MWG	First	Last	Description	Witness	Auth-enticated?	Notes
Comp.	6364	6368	Dr. Jim Kunkel Resume	Kunkel	N/A	
MWG	22937	22943	Email chain re: “Will County ponds clean out: Update	Maddox	N	Revised description and Bates range
MWG	44982	44982	Email from Maria Race regarding the Waukegan plant (July 26. 2013)	Race	N/A	
			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	Race	N	

			(Mar. 31, 2015)			
			Midwest Generation, LLC's Supplemental Response to Complainants' Second Set of Interrogatories (June 10, 2015)	Race	N	
			MWG's Supplemental Response to Complainants' First set of Interrogatories (Jun 10, 2015).	Race	N	
			Race Dep. Tr.	Race	N	

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Prairie Rivers Network*

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312-726-2938 (phone)

312-726-5206 (fax)

*Attorney for CARE*

# **Exhibit A**

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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CITIZENS AGAINST RUINING THE	)	
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v.	)	
	)	
MIDWEST GENERATION, LLC,	)	
	)	
Respondents	)	

**COMPLAINANTS' EXHIBIT LIST FOR EACH WITNESS**

Pursuant to the telephonic conference between the hearing officer and parties in PCB No. 2013-15, included herein is a list of exhibits for each witness.

On October 17, 2017 Complainants submitted a proposal to Respondents to minimize the number of groundwater reports to be introduced as exhibits. All of the groundwater reports listed herein were included in Complainants' October 17, 2017 proposal. Any of these groundwater reports that has not yet been authenticated is being resubmitted for authentication.

Complainants are also resubmitting for authentication all documents where Complainants have indicated below that they have resolved an objection specific to that document.

Finally, as Complainants stated on October 6, 2017 when submitting their Witness Specific Exhibit Lists, Complainants note that the document description for exhibit lists in **COMPLAINANTS' WITNESS SPECIFIC EXHIBIT LISTS** and **COMPLAINANTS' PRE-HEARING MEMORANDUM** should not be treated as limiting. Similarly, the document description for exhibit lists in **COMPLAINANTS' EXHIBIT LIST FOR EACH WITNESS** should not be treated as limiting. For instance, the bates ranges listed for emails include entire email chains. For emails, Complainants provided descriptive information, in some cases, that identifies exclusively the top email in the chain. That descriptive information was intended solely to aid in the identification of the document and not intended to be limiting information. Complainants intend to use the entire email chain as an exhibit (and may question witnesses about any email in the chain) as identified by the applicable bates ranges that accompany the document descriptions.

## Complainants Exhibit List for Each Witness

Comp./MWG	First	Last	Description	Witness	Authenticated?	Notes
Comp.	3957	4596	Kosson et al., Characterization of Coal Combustion Residues from Electric Utilities - Leaching and Characterization Data, EPA/600/R-09/151.	Kunkel	N/A	
Comp.	15059	15250	EPRI 2006	Kunkel	N/A	
Comp.	16136	16544	US EPA Risk Assessment	Kunkel	N/A	
Comp.	17321	17472	EPRI 2010	Kunkel	N/A	
Comp.	17473		EPRI 2012	Kunkel	N/A	
Comp.	17477	17685	Ohio EPA 2004	Kunkel	N/A	
Comp.	18848	19061	USGS river levels	Kunkel	N/A	
Comp.	19062	19066	Illinois EPA coal ash impoundment strategy report (2010)	Kunkel	N/A	
Comp.	19067	19298	Illinois EPA technical support document (2013)	Kunkel	N/A	
Comp.	21738	21748	Nemerow text excerpt	Kunkel	N/A	
Comp.	41681	41715	Kunkel meeting minutes, 8/20/2014 (and emails attaching)	Kunkel	N/A	
Comp.	41735	41744	Kunkel, Final letter report on Dr. Hennet's documents, 7/22/14 (and emails attaching)	Kunkel	N/A	



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Comp.	46974	46975	Emails between Russ and Kunkel, 8/11-8/20 2014	Kunkel	N/A	
Comp.	46976		Email from Kunkel to Duggan (EIP), 9/17/14	Kunkel	N/A	
Comp.	49492	49497	Email from Kunkel to Bugel, 11/7/14	Kunkel	N/A	
Comp.	49498	49500	Email from Kunkel to Bugel, 8/21/14	Kunkel	N/A	
Comp.	52686		Kunkel call notes, 9/12/14	Kunkel	N/A	
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)	Gnat	N	
Comp.	53740	53740	Geosyntech, Notification of Intent to Initiate Closure of the Former Ash Basin, Powerton (Dec. 17, 2015)	Race, Kelly	Y	
MWG	506	512	Letter written by Nijman Franzetti ccing Race states "a core sample of the Pond 3S liner was retained by the station and a photograph of it is attached as Attachment	Race	N/A	

			A			
MWG	599	610	MWG Waukegan ELUC Application, CCA	Gnat	N/A	
MWG	613	622	MWG Will County ELUC Application, CCA	Gnat	N/A	
MWG	622	666	CCA - GMZ Application - Will County	Gnat	N/A	
MWG	667	724	CCA - GMZ Application - Joliet	Gnat	N/A	
MWG	724	775	CCA - GMZ Application - Powerton	Gnat	N/A	
MWG	9644	9645	Letter from Gnat to Lynn Dunaway, IEPA, MSJ Exhibit D19	Gnat	N/A	
MWG	11572	11577	2007 work order to excavate and clean East Ash Pond to expose liner for repair	Lux	N/A	
MWG	712	723	MWG Powerton ELUC Application, CCA	Gnat	N/A	
MWG	328	332	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Waukegan Generating Station, (June 11, 2012)	Race	Y	

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MWG	333	341	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Will County Generating Station, (June 11, 2012)	Race	Y	
MWG	342	347	Joliet Notice of Violation (June 11, 2012)	Race	Y	
MWG	348	358	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Powerton Generating Station, (June 11, 2012)	Race	Y	
MWG	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	Race	Y	
MWG	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,	Race	Y	

			2012			
MWG	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	Race	Y	
MWG	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	Race	Y	
MWG	552	558	Compliance Commitment Agreement Acceptance for Powerton	Kelly	N/A	
MWG	594	598	Midwest Generation, Compliance Commitment Agreement-Well Installation Documentation, Waukegan Station, (Jan	Gnat, Kunkel	Y	

			15, 2013)			
MWG	818	819	Unsigned Letter from Maria Race to Lynn Dunaway	Race	N	
MWG	821	2458	United States Environmental Protection Agency, Questionnaire for the Steam Electric Power Generation Effluent Guidelines, (2010)	Race, Kelly	Y	
MWG	3253	3644	ENSR Consulting, Phase II Environmental Site Assessment of the ComEd Powerton Generating Station, Route 29 & Mantino Road, Pekin, Illinois, (1998)	Race, Kelly, Kunkel	Y	
MWG	4044	4082	Powerton Bypass Cleaning Basin, 2012 quarter 1	Race	N/A	
MWG	4170	4323	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Powerton Generating Station – Ash Impoundments. See also: Bates Comp. 002563-002716 (July 22, 2013)	Gnat	N	
MWG	4748	4783	Powerton Bi-Monthly Groundwater Monitoring Report,	Race, Kunkel	N	

			Metal Cleaning Basin, April 2011 (See also Bates Comp. 000184- 000219)			
MWG	5114	5136	Waukegan ELUC, Annual Groundwater Monitoring Report-- July 2013	Race	N	Revised bates range
MWG	5699	6039	ENSR Consulting, Phase II Environmental Site Assessment of the ComEd Will County Generating Station, (1998)	Race, Kunkel, Maddox	Y	
MWG	6670	6746	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Will County Generating Station – Ash Impoundments. Also: Bates Comp. 002773- 002838 (July 22, 2013)	Gnat	N	Revised bates range
MWG	6964	7080	Patrick Engineering, Joliet Patrick Hydrogeological Assessment Report, (2011)	Race, Kunkel	Y	
MWG	7081	7147	Patrick Engineering, Powerton Hydrogeologic Assessment Report, (Feb. 2011)	Race, Kunkel	Y	
MWG	7148	7229	Patrick Engineering, Hydrogeological Assessment Report --	Race, Kunkel	Y	

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			Waukegan, 2011			
MWG	7230	7340	Patrick Engineering, Hydrogeological Assessment Report -- Will County, (2011)	Race, Kunkel	Y	
MWG	7362	7362	KPRG, Figure 1: Agreed Upon Monitoring Well Location, Powerton, (Dec. 12, 2012)	Gnat	Y	
MWG	8502	8536	ENSR, Phase I Environmental Site Assessment of the ComEd Powerton Generating Station, (1998)	Race, Kelly	Y	
MWG	9644	9645	Letter from Gnat/KPRG to MWG (September 11, 2013)	Gnat, Kunkel	N/A	
MWG	9668	9731	Midwest Generation, Application for Permit or Construction Approval, Secondary Ash Settling Basin Liner Replacement -- Powerton Station, (Dec. 22, 2009)	Race	Y	
MWG	10640	10658	Patrick Engineering, Monitoring Well Completion Reports for Powerton Ash Pond Assessments, (October 20, 2010)	Race	Y	
MWG	10759	10771	Patrick Engineering, Proposal for Ash Pond	Race	Y	

			Investigation, (Aug. 18, 2010)			
MWG	11233	11237	Letter from Richard Gnat to Lynn Dunaway, IEPA, Powerton Generating Station (Sept. 11, 2013)	Gnat	Y	
MWG	11234	11237	Powerton Compliance Commitment Agreement Letter (Sept. 11, 2013)	Kelly	N/A	
MWG	11302	11492	Andrews Environmental Engineering, Report of sampling in Limestone Runoff Basin at powerton (June 8, 2004)	Race, Seymour	N/A	
MWG	11573	11580	2007 purchase order for liner repair	Lux, Kunkel	N/A	
MWG	11581	11583	2010 purchase order for liner repair	Race, Kunkel	N/A	
MWG	11924	11954	RETEC, Semiannual Groundwater Monitoring Report- December 2003, Environmental Land Use Control Implementation, Waukegan Generating Station (Jan. 16, 2004)	Race, Kunkel	N	
MWG	11961	11965	Letter from Michael Smith, Structural Project Engineer, Doyen and Associates, Incorporated to Tom	Lux, Kunkel	N	



			Dilla, ComEd, Waukegan Station (Aug. 7, 1997)			
MWG	12003	12040	ENSR, Phase I Environmental Site Assessment of the ComEd Waukegan Generating Station, (Oct. 1998)	Race	Y	Revised per MWG objection, resubmitted for authentication
MWG	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)	Gnat, Kunkel	Y	
MWG	12847		North Antelope Mine Coal Specifications, NDI	Race, Kunkel	Y	Revised per MWG objection, resubmitted for authentication
MWG	13087	13239	KPRG, Phase II Environmental Site Investigation of 525 E. 135th Street (Sept. 30, 2009)	Gnat	Y	Revised per MWG objection, resubmitted for authentication
MWG	13734	13736	Email from Eric J. Tlachac to Maria Race (Oct. 24, 2007)	Race, Kunkel	Y	
MWG	13737	13742	Email Exchange Re "Will County South Ash Pond Liner Design Status"	Race, Kunkel	Y	
MWG	13746	13746	Email from Jeffrey Shuh to Maria Race	Race	Y	

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MWG	13774	13774	Email Exchange Re "Ash Pond #3"	Maddox	Y	
MWG	14096	14101	Email Exchange Re "Data tables for Ash Pond Investigations"	Race, Kunkel	Y	
MWG	14157	14173	Email from Richard Frenndt to Maria Race (Feb. 10, 2012)	Race, Kunkel	Y	
MWG	14177	14181	Email Exchange Re "3S Ash Pond Liner Damage-Will County"	Maddox, Kunkel	Y	
MWG	14225	14269	Email from Richard Frenndt to Maria Race Aug. 9, 2012)	Race, Kunkel	Y	
MWG	14292		Mark Kelly Email (Apr. 12, 2013)	Kelly	N/A	
MWG	14522	14544	Waukegan Station New Wells and ELUC Information	Gnat	Y	
MWG	14744	14747	Midland Standard Engineering & Testing, Inc., Laboratory Testing Services-Will County station (Aug. 22, 2012)	Gnat	Y	
MWG	14885	14886	Letter Re recycle line at Powerton Old Ash Basin (Aug. 2012)	Kelly	N/A	
MWG	16277	16278	Email from Bill Buscher at IEPA to Maria Race (Oct. 26, 2011)	Race	Y	
MWG	18824	19071	KPRG, Coal Ash and Slag Removal	Gnat, Kunkel,	Y	

			Documentation	Seymour		
MWG	19067	19428	KPRG, Joliet #29 Ash Berm Removal Summary (Sept. 20, 2007)	Gnat	Y	
MWG	19430	19441	KPRG, Joliet #29 Former Ash Burial Area Runoff Erosion Repair Documentation, (Sept. 26, 2009)	Gnat, Kunkel	Y	
MWG	19442	19452	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2009, (Aug. 27, 2009)	Gnat, Kunkel	Y	
MWG	19455	19459	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2010 (Aug. 27, 2010)	Gnat, Kunkel	N/A	
MWG	19461	19468	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection and Erosion Repair Documentation, (2010)	Gnat, Kunkel	Y	Bates range revised
MWG	19470	19473	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2012, (Sept. 19, 2012)	Gnat, Kunkel	N	
MWG	19474	19481	KPRG, Joliet #29 Former Ash Burial Area Runoff Erosion Repair, (Sept. 26, 2012)	Gnat, Kunkel	Y	
MWG	19483	19483	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection	Gnat, Kunkel	Y	

			2013, (Aug. 21, 2013)			
MWG	19486	19575	KPRG, Joliet #29 Summary Report (July 25, 2005)	Gnat	Y	
MWG	19486	19668	KPRG, CCB Determination Support, Joliet, Illinois (July 25, 2005).	Gnat, Kunkel, Seymour	N/A	
MWG	21330	21332	Mark Kelly Email (July 13, 2012)	Kelly	N/A	
MWG	21335	21336	Email exchange re: "refreshing my memory" (Aug. 12, 2012 to Aug. 13, 2012)	Kelly	N/A	
MWG	21361	21367	Email from Maria Race to William Gaynor (Oct. 19, 2012)	Race	N	
MWG	21464	21465	Email chain re Powerton ash impoundments (June 8, 2010)	Race, Kelly	N/A	
MWG	21746	21750	Letter from Amy Hanrahan to Andrea Rhodes, Illinois EPA, Well Installation Documentation, Powerton (Dec. 14, 2012)	Race, Kunkel	Y	
MWG	22014	22018	Email Exchange Re "Powerton Secondary Ash Basin Relining" (Mar. 27, 2013)	Lux	Y	
MWG	22020	22020	Email Exchange Re Ground Water Issues	Lux	Y	

			(Mar. 27, 2013)			
MWG	22023	22023	Email from William Gaynor to Amy Hanrahan and others, 4/9/2013.	Lux, Kelly	Y	
MWG	22765	22766	Email from William Gaynor to Charles J Hart and others, 9/24/2013.	Lux	Y	
MWG	22846	22849	Email from William Gaynor to Christopher Lux, 3/8/2013.	Lux	Y	
MWG	22934	22943	Email from Chris Lux to James Sault and other, 5/23/2013.	Maddox	N	
MWG	23301	23597	ENSR, Phase II Environmental Site Assessment for Joliet 29 (Dec. 1998).	Race, Kunkel	Y	
MWG	23608	23617	NRT, Technical Memorandum No. 1, Impoundment Ranking and Replacement Liner Recommendations (Dec. 1, 2005).	Race	Y	
MWG	23630	23647	NRT, Technical Memorandum No. 3, Impoundment Liner Upgrade Priority, and Liner System Options and Cost (Nov. 22, 2006).	Race, Kunkel	Y	
MWG	23648	23654	Letter from Bruce R. Henset, NRT, to Maria Race re: Conceptual	Race	Y	

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			Design for Surface Impoundment Liners (Dec. 21, 2005).			
MWG	24221	24231	Letter from Michael J. Smith, Valdes Engineering, to Chris Lux, re: Waukegan Ash Pond Berm Visual Inspection (6/12/14).	Lux	Y	
MWG	24264	24386	Letter from Richard Gnat, KPRG, to Maria Race re: Geotechnical Analysis of Soil Surrounding Settling Basins/Ponds (10/13/2005).	Gnat, Kunkel	Y	
MWG	24387	24392	Letter from Richard Gnat, KPRG, to Maria Race re: Re-Issuance of Figure 4-1 for Geotechnical Summary Report (Oct. 25,2005).	Gnat	Y	
MWG	25139	25167	ENSR, Phase I Environmental Site Assessment for Joliet 29 (Oct. 1998).	Race, Kunkel	Y	
MWG	27001	27001	Email from Jeffrey Beaudry to Aron Yakima and others, 7/17/2013.	Maddox	Y	
MWG	27130	27136	Email Exchange Re: Leak Location Survey for 2S Pond at MWGen - Will County	Maddox	Y	
MWG	27555	27556	Email from David Kamano to Jeff	Maddox	N	

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			Beaudry and others, 2/12/2013.			
MWG	28031	28034	Email from Terry Kosmatka to Christopher lux and other, 9/13/2013.	Lux, Kunkel	Y	
MWG	28326	28354	Will County Email Exchanges	Maddox	N	
MWG	28849	28851	Fax from Tedd Mills, Brieser Construction, to Beckie Maddox, 10/19/2009.	Maddox, Kunkel	Y	
MWG	28862	28863	Stormwater Construction Site Inspection Report signed by Beckie Maddox, 10/1/2009.	Maddox, Kunkel	Y	
MWG	29589	29590	Letter from Donald Claybaugh to IEPA re: "IEMA incident" at Will County (12/11/2008).	Maddox	Y	
MWG	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).	Race, Kunkel	N	
MWG	30458	30482	Application for Permit for Construction Approval, Powerton (2009)	Kelly	N/A	
MWG	31492	31493	Photographs of liner	Lux	N	

			installation			
MWG	33706	33867	Powerton Bypass Basin liner replacement work summary (Oct. 2010)	Kelly	N/A	
MWG	33867	33997	Construction Documentation for the Joliet 29 Pond 3 Liner Replacement	Race	Y	Revised per MWG objection, resubmitted for authentication
MWG	37979	37980	IEPA Meeting minutes, Maria Race in attendance, 5/5/2010.	Race, Kunkel	N	
MWG	37981	37983	Patrick Engineering, IEPA meeting minutes, Maria Race in attendance, 5/5/2010.	Race, Kunkel	N	
MWG	38471	38523	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011 Joliet #29 Generating Station- Ash Impoundment Bates Comp. 000131-000183 (Aug. 1, 2011)	Race	N	
MWG	39620	39646	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Ash Impoundment (Apr. 18, 2011)	Race	N	



MWG	40005	40044	Patrick Engineering Inc., Quarterly Groundwater Monitoring Results, Third Quarter 2011, Powerton Generating Station –Bypass Cleaning Basin (See also Bates Comp. 4088-4127)	Race	N	
MWG	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)	Race, Kunkel	N	
MWG	40589	40629	Patrick Engineering, Groundwater Monitoring Results – April 2012, Powerton Generating Station – Metal Cleaning Basin (May 17, 2012) (See also Bates Comp. 001019-001059)	Race	N	
MWG	41609	41671	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter 2012 Waukegan Generating Station- Ash Impoundments (Jan. 16, 2013) (See also Bates Comp. 001929-	Race	N	

			002000)			
MWG	41735	41742	Patrick Engineering, Ash Pond Data Evaluation & Summary. Waukegan Station, May 2012 (including two draft versions and one final version).	Race	N	
MWG	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 )	Race	N	
MWG	43695	43848	Groundwater Monitoring Report, Waukegan, Third Quarter 2014 (2014)	Gnat	N	
MWG	43849	43862	Groundwater data tables for Waukegan Wells MW-1 through MW-15 (various date ranges)	Gnat	N	
MWG	43868	43869	Richard Gnat curriculum vitae	Gnat	Y	
MWG	44124		Mark Kelly CV	Kelly	N/A	
MWG	44147	44147	Letter from Richard Gnat to Peter O'Day,	Gnat	Y	

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			Ash Burial Runoff Inspection (Aug. 28, 2014)			
MWG	44148	44152	Letter from Richard Gnat to James DiCola, Erosion Repair Documentation (Sept. 22, 2011)	Gnat	Y	
MWG	44153	44155	Letter from Richard Gnat to James DiCola, Inspection Summary Letter Aug. 22, 2011)	Gnat	Y	
MWG	44269	44269	Email from James DiCola to Peter O'Day, Ash Burial Runoff Inspection (July 28, 2013)	Gnat	N	
MWG	44557	44557	Email from James DiCola to Richard Gnat re Ash Burial Area (Sept. 15, 2010)	Gnat	Y	
MWG	44558	44583	Email Exchange Re: "Ash Impoundment Project (Groundwater Monitoring Well Installations)	Race	Y	
MWG	44588	44589	Email about Ash Dumping on Station Property, (Sept. 12, 2014)	Lux, Veenbaas	Y	
MWG	44593		Fredrick Veenbaas Email (Mar. 21, 2014)	Veenbaas	N/A	
MWG	44615	44617	Email from Maria Race to Lynn Dunaway	Race, Kunkel	N	

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			(Aug. 28, 2014)			
MWG	44621	44622	Email, from C. Lux to Wayne Ollila (Oct. 30, 2014)	Lux, Kunkel	N	
MWG	44623	44623	Email from Chris Lux to Mike Smith (May 27, 2014)	Lux, Kunkel	N	
MWG	44969	44973	Email from Brad Castle to Rebecca Maddox , Fred Veenbaas (May 23, 2012)	Maddox	Y	
MWG	44979	44979	Email from Rebecca Maddox to Margaret Ruane (May 29, 2012)	Maddox	Y	
MWG	45328	45416	NRG Energy, Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Waukegan Generating Station – Ash Impoundments (Jan. 22, 2015)	Gnat, Seymour	Y	
MWG	45512	45512	KPRG, Aerial Distribution of Groundwater Sampling Results (Oct. 6, 2014)	Gnat	Y	
MWG	45513	45538	TestAmerica Analytical Report (June 3, 2014)	Gnat	N	Revised bates range
MWG	45539	45562	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling

MWG	45563	45591	Waukegan tannery ELUC lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	45592	45616	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	45617	45647	Waukegan tannery ELUC lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	45648	45649	KPRG Boring Logs for MWs 8 and 9, Waukegan, (April 29, 2014)	Gnat, Kunkel	Y	
MWG	45779	46054	ENSR Phase II Environmental Site Assessment Waukegan Generating Station (as an ancient document)	Race, Kunkel, Lux	Y	
MWG	46113	46122	Andrews Environmental Engineering, Inc., Former Griess Pflieger Tannery Site, (Nov. 8, 2005)	Race	Y	
MWG	46194	46201	Waukegan ELUC report, June 6, 2002	Race	N	Revised bates range
MWG	46202	46210	General boiler data, 1996-98	Race	N/A	

MWG	48439	48439	Table 1. Groundwater Elevations - Midwest Generation, LLC, Waukegan Station, Waukegan, IL Bates MWG13-15_48439	Gnat	N	
MWG	48440	48492	ENSR, Phase II Environmental Site Assessment for Joliet 29 Station (Dec. 7, 1998)	Race	Y	
MWG	48566	48566	Email from Rebecca Maddox to Yvonne Dedrickson (Sept. 1, 2010)	Maddox	N	
MWG	48568	48569	Email from Raymond Wolan to Rebecca Maddox and Daryl Miller (July 28, 2010)	Maddox	Y	
MWG	48586	48586	Email from Rebecca Maddox to John Shields and Black Connolly (July 28, 2010)	Maddox	Y	
MWG	48612	48612	Email from Rebecca Maddox to Christopher Lux (Sept. 3, 2008)	Maddox, Kunkel	Y	
MWG	48644	48644	KPRG 1974 Aerial Photo of Waukegan Station	Gnat	Y	
MWG	49272	49285	Letter from Michael Smith to Christopher Lux (May 29, 2015)	Lux	Y	
MWG	49286	49292	Email Exchange Re: NRG Waukegan Station West & East Ash Pond	Lux	Y	

			Liner Repairs (Mar. 21, 2015)			
MWG	49565	49652	KPRG, CCB Determination Support, Midwest Generation Will County Station (Sept. 8, 2015)	Gnat, Seymour	Y	
MWG	49736	49741	Training Sign-In Sheet, NDI	Kelly	N/A	
MWG	49775	49838	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015 Joliet #29 Generating Station – Ash Impoundments (July 22, 2015)	Gnat, Seymour	N	
MWG	49839	49966	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Powerton Generating Station – Ash Impoundments(July 22, 2015)	Gnat, Seymour	N	
MWG	49967	50028	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Will County Generating Station – Ash Impoundments (July 22, 2015)	Gnat, Seymour	N	
MWG	50149	50170	USEPA CCR Rule Qualified Person	Kelly	N/A	

			Training Presentation			
MWG	51557	51573	NRT memo to M.Race, 6/17/08	Race	Y	
MWG	54258	54259	Letter from Maria Race to IEPA re Waukegan CCA (Oct. 22, 2013)	Race	N	
MWG	56632	56638	Draft Groundwater Analytical Results, Waukegan	Gnat	N	
MWG	58155	58291	NRG, Annual and Quarterly Groundwater Monitoring Report - Powerton Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Gnat	Y	Description revised to state document author
MWG	58292	58388	NRG, Annual and Quarterly Groundwater Monitoring Report - Joliet #29 Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Gnat	Y	Description revised to state document author
MWG	58389	58489	NRG, Annual and Quarterly Groundwater Monitoring Report - Will County Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Gnat	Y	Description revised to state document author
MWG	58490	58582	NRG, Annual and Quarterly Groundwater Monitoring Report - Waukegan Generating Station, 4th Quarter 2016 (Jan. 19, 2017)	Gnat	Y	Description revised to state document author



MWG	58588	58592	Powerton Generating Station - Metals Cleaning Basin Quarterly Groundwater Sampling Summary - 4th Quarter 2016 (Jan. 24, 2017)	Gnat	N	
MWG	58593	58615	TestAmerica Analytical Report, Joliet #29 (May 31, 2016)	Gnat	N	Revised bates range
MWG	58637	58675	Powerton lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	58705	58733	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	58759	58783	Will County lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	58807	58831	Joliet lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	58853	58893	Powerton lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling

MWG	58921	58949	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	58973	58998	Will County lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	59021	59046	Joliet lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	59069	59107	Powerton lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	59140	59168	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	59193	59217	Will County lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	59603	59693	Geosyntech, Waukegan History of Construction, East and West Ash Basins (October 2016)	Race	Y	

MWG	59778	59802	TestAmerica Analytical Report, Joliet# 29 (Feb. 25, 2016)	Gnat	N	Revised bates range
MWG	59873	59909	Powerton lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	60015	60039	Will County lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	60113	60141	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	60168	60196	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61411	61442	TestAmerica Analytical Report, Waukegan (Dec. 21, 2016)	Gnat	Y	Revised per MWG objection, resubmitted for authentication
MWG	61443	61480	Waukegan ELUC data, 3/18, 5/18, and 9/13 2016	Race	N	Revised bates range
MWG	61481	61518	Waukegan tannery ELUC lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling

MWG	61519	61552	Waukegan tannery ELUC lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61553	61574	NRG, Annaul Groundwater Monitoring Report - July 2016 - Waukegan Generating Station	Gnat, Kunkel	N	
MWG	61575	61599	TestAmerica Analytical Reports 2017	Gnat	N	Revised bates range
MWG	61621	61662	Powerton lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61693	61719	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61744	61767	Will County lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61790	61813	Joliet lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61834	61873	Powerton lab results	Gnat	N/A	Bates range revised to address MWG objection to

						bundling
MWG	61904	61930	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	61955	61979	Will County lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62216	62321	Powerton groundwater report, 2017 quarter 1	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62322	62386	Joliet groundwater report, April 2017	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62387	62468	Waukegan groundwater report, May 2017	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62469	62534	Will County groundwater report, May 2017	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62535	62642	Powerton groundwater report, May 2017	Gnat	N/A	Bates range revised to address MWG objection to

						bundling
MWG	62653	62682	Waukegan tannery ELUC lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62706	62725	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62744	62767	Waukegan lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
MWG	62789	62816	Waukegan tannery ELUC lab results	Gnat	N/A	Bates range revised to address MWG objection to bundling
			Christopher Lux deposition transcript	Lux	N	
			Richard Gnat deposition Transcript	Gnat	N	
			Terzaghi, K., Peck, R. B. and Mesri, G., 1996. Soil Mechanics in Engineering Practice, 3rd ed., John Wiley & Sons, Inc., New York, New York.	Kunkel	N/A	
			Frederick Veenbaas deposition transcript	Kunkel	N/A	

			Rebecca Maddox deposition transcript	Kunkel	N/A	
			Schroeder, P. R., Aziz, N. M., Lloyd, C. M. and Zappi, P. A. 1994. The Hydrologic Evaluation of Landfill Performance (HELP) Model: User's Guide for Version 3. EPA/600/R-94/168a. September. U.S. Environmental Protection Agency Office of Research and Development, Washington, DC. 94 p. Appendix A. (Publicly available).	Kunkel	N/A	
			Kelly deposition transcript	Kunkel	N/A	
			ASTM D3987-1987	Kunkel, Seymour	N/A	
			ASTM D3987-85 (1985)	Kunkel, Seymour	N/A	
			Gilbert, R.O. 1987. Statistical Methods for Environmental Pollution Monitoring. New York: va Nostrand Reinhold. ISBN 0-442-23050-8. 320 pp.	Kunkel	N/A	
			US EPA, 40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System; Disposal of Coal	Kunkel, Seymour	N/A	

			Combustion Residuals from Electric Utilities, Final Rule (Ar. 17, 2015), 80 Fed. Reg. 21302-21501.			
			Nemerow, 1963. Theory and Practices of Industrial Waste Treatment. Reading, MA: Addison-Wesley Publishing Co., Inc.	Kunkel	N/A	
			James Junkel expert reports: 7/1/15, 12/8/15, and 3/16/16	Kunkel	N/A	
			John Seymour expert reports, 11/2/15, 2/29/16, and Temporal Trend Testing Results Notes	Seymour	N/A	

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **COMPLAINANTS' EXHIBIT LIST FOR EACH WITNESS** was served electronically to all parties of record listed below, on October 18, 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' SUPPLEMENTAL EXHIBIT LIST FOR EACH WITNESS** was filed electronically on October 20, 2017 and served via electronic mail on October 20, 2017 on the parties listed on the following Service List.

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