

NOTES FROM TELECOM W/ ABEL RUSS ON 9-12-14  
14H15 TO 14H25

Abel will be out three weeks on paternity leave. Then he is moving to Vermont and will be based there. Jen Duggan (EIP Managing Attorney) of EIP will be covering for Abel during his absence.

Right now, the discovery process has generated over 8,000 pages, many of which are not necessary for me to review. EIP will try to select the documents germane to my review. The documents are currently resident with ELPC in Chicago who is cataloging the documents. ELPC will try to send me some of the supplemental responses to the EPA by MWG. There also are some older (1998) site assessments for the four power plants?

Regarding the Waukegan plant:

- There are G/W wells west of the plant at an old tannery site and these wells have some water level and W/Q data
- One question to answer is if the tannery may be a source of boron seen in the Waukegan wells
- Another question is if the tannery is upgradient from the Waukegan plant
- There is a WWTP south of the plant which also has some monitoring wells
- I should look at MWG supplemental responses to EPA's letter

My ultimate charge is to write a report to EIP/ELPC which states that contamination at the four power plant sites is due to the leaking ash ponds. I also will be rebutting MWG's assertion that the ponds are NOT the source of G/W contamination at the four power plant sites.

My reports should be DRAFT reports so that attorney-client privilege is preserved and I should not document telecons with formal meeting minutes.

I should begin my report immediately regarding the four power plant sites based on the data and information I have and augment the report as more information from discovery is sent to me.

