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

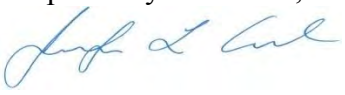
To: John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolf Street, Suite 11-500
Chicago, IL 60601

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolf Street, Suite 11-500
Chicago, IL 60601

Persons included on the attached
SERVICE LIST

PLEASE TAKE NOTICE that on January 30, 2014 I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, **MOTION FOR LEAVE TO REPLY TO MIDWEST GENERATION LLC'S RESPONSE TO COMPLAINANTS' SECOND MOTIO NFOR LEAVE TO FILE AMENDED COMPLAINT** and **REPLY**, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,



Jennifer L. Cassel
Staff Attorney
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ph (312) 795-3726

Dated: January 30, 2014

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

MOTION FOR LEAVE TO REPLY TO MWG'S RESPONSE TO COMPLAINANTS' SECOND MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

NOW COME the Complainants, Sierra Club, Environmental Law and Policy Center (ELPC), Prairie Rivers Network, and Citizens Against Ruining the Environment (collectively, "Citizens Groups"), by and through counsel, and move the Illinois Pollution Control Board for leave to reply to Midwest Generation LLC's ("MWG") Response to Complainants' Second Motion for Leave to File Amended Complaint, and in support of their motion state as follows:

1. On January 14, 2015 Citizens Groups filed our Second Motion for Leave to File Amended Complaint ("Second Motion to Amend"),[1] to which we attached a First Amended Complaint.

2. On January 27, 2015, MWG filed its Response to Complainants' Second Motion for Leave to File Amended Complaint ("Second Response"). In that Second Response, MWG states that it "does not conceptually oppose Complainants' Second Motion," but argues that the

[1] Concurrently with the present Motion, Citizens Groups are filing a Notice of Withdrawal of the First Motion to Amend (withdrawing solely that motion, not the Second Motion to Amend).

First Amended Complaint does not conform to this Board's Order dated October 3, 2013, because it retains allegations that groundwater samples violated Maximum Contaminant Levels ("MCLs") codified at 40 C.F.R. Part 257, Appendix 1. Second Response at ¶¶ 4 and 5. MWG requests that this Board "Order Complainants to strike the portions of its Amended Complaint consistent with the Board's prior Order of October 3, 2013." *Id*. at 4.

3. Although Citizens Groups believe that our First Amended Complaint is consistent with the October 3, 2013 Board Order in this case, we seek leave to file a very brief Reply to MWG's Response so that we can, without further delay, file a Second Amended Complaint addressing MWG's concerns. Our Reply is attached hereto as Exhibit 1. Allowing this Reply, to which is attached the modified amended complaint ready for this Board's consideration, will expedite this process and save all parties, as well as this Board, time and resources.

WHEREFORE, for all of the above-mentioned reasons, Citizens Groups respectfully request leave to file the attached Reply to Midwest Generation LLC's Response to Complainants' Second Motion for Leave to File Amended Complaint.

Respectfully submitted,

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Attorney for CARE

Illinois Pollution Control Board
2013-015

Exhibit 1

To Motion for Leave to Reply to Midwest Generation LLC's Response to Complainants' Second Motion for Leave to File Amended Complaint

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.	)	PCB No-2013-015
	)	(Enforcement – Water)
MIDWEST GENERATION, LLC,	)	
	)	
Respondents	)	

CITIZENS GROUPS' REPLY TO MWG'S RESPONSE TO COMPLAINANTS' SECOND MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

With leave of the Board, the Complainants, Sierra Club, Environmental Law and Policy Center (ELPC), Prairie Rivers Network, and Citizens Against Ruining the Environment (collectively, "Citizens Groups"), by and through counsel, hereby respectfully submit their Reply to Midwest Generation LLC's ("MWG") Response to Complainants' Second Motion for Leave to File Amended Complaint. As discussed further below, in order to save all parties and this Board time and resources, Citizens Groups agree to modify our amended complaint to remove certain allegations previously contained in our amended complaint, and we request that this Board accept our Second Amended Complaint for hearing.

1. On October 3, 2012, Citizens Groups filed a complaint in this matter ("Original Complaint"). Paragraphs of the Original Complaint relevant to the present motion include paragraphs 43, 46, and 49, which state, respectively: "MWG, through the coal ash disposal ponds at Powerton, has caused or contributed to contamination of the groundwater beneath Powerton in violation of 415 ILCS 5/21(a) and 40 C.F.R. §§ 257.1 and 257.3-4, as shown in Table 1;"

"MWG, through the coal ash disposal ponds at Waukegan, has caused or contributed to contamination of the groundwater beneath Waukegan in violation of 415 ILCS 5/21(a), and 40 C.F.R. §§ 257.1 and 257.3-4 as shown in Table 2;" and "MWG, through the coal ash disposal ponds at Will County, has caused or contributed to contamination of the groundwater beneath Will County in violation of 415 ILCS 5/21(a), and 40 C.F.R. §§ 257.1 and 257.3-4, as shown in Table 3."

2. On October 3, 2013, the Board refused to dismiss the Original Complaint but ordered that specific, limited portions of the Original Complaint be struck. Specifically, the Board granted MWG's request to strike "the portions of *paragraphs 43, 46, and 49* claiming MWG violated 40 C.F.R. §§ 257.1 and 257.3-4." October 3, 2013 Board Order at 25 (emphasis added). The Board also stated that it "does not... exclude the possibility that an exceedance of the [40 C.F.R. Part 257, Appendix I] MCLs at one or more power plants may be evidence tending to show a violation of Section 21(a) of the Act." *Id*.

3. On December 15, 2014, Citizens Groups filed Citizens Groups' Motion for Leave to File Amended Complaint, attaching an amended Complaint ("First Motion to Amend").

4. On December 29, 2014, Respondent MWG filed its Response to Complainants' Motion for Leave to File Amended Complaint ("First Response"), in which it stated that MWG did "not conceptually object to" the First Motion to Amend (First Response at 1). MWG, however, sought two changes to the amended Complaint along with a revised discovery schedule. Specifically, MWG requested that the Board grant its request for an extended discovery schedule, order Citizens Groups to remove the term "other waste" from the amended Complaint, and "Order Complainants to strike the portions of its Amended Complaint consistent with the Board's prior Order of October 3, 2013." First Response at 3.

5. On January 14, 2015, Citizens Groups filed their Second Motion for Leave To File Amended Complaint ("Second Motion to Amend"),[1] to which we attached a First Amended Complaint. In that Second Motion to Amend and the First Amended Complaint, Citizens Groups addressed all of the requests MWG made in its First Response. We noted that we did not oppose an extension of fact discovery as long as such an extension applied equally to all parties, we removed references to "other waste," and, finally, consistent with the October 3, 2013 Board Order, we deleted the portions of paragraphs 43, 46 and 49 of the Original Complaint which alleged violations of 40 C.F.R. §§257.1 and 257.3-4. Second Motion to Amend at ¶¶ 13 – 15.

6. On January 27, 2015, MWG filed its Response to Complainants' Second Motion for Leave to File Amended Complaint ("Second Response"). In that Second Response, MWG states that it "does not conceptually oppose Complainants' Second Motion," but claims that Citizens Groups failed to delete all of the allegations that the Board struck in its October 3, 2013 Board Order. Second Response at ¶¶ 4, 5. Specifically, MWG argues that Citizens Groups should have deleted allegations that groundwater samples violated Maximum Contaminant Levels ("MCLs") codified at 40 C.F.R. Part 257, Appendix 1, which allegations appeared in paragraphs 44, 47 and 50 of the Original Complaint. *Id*. Complaint at ¶¶ 44, 47 and 50. In addition, MWG agrees that an extension to the discovery schedule should apply to all parties, but argues that that extension should be 60 days and should be limited to written discovery. Second Response at 3.

7. Citizens Groups believe that we acted wholly consistently with the October 3, 2013 Board Order in deleting solely those portions of paragraphs 43, 46 and 49 of the Original Complaint – paragraphs 42, 45 and 48 of the First Amended Complaint – that alleged violations

[1] Concurrently with this Reply, Citizens Groups are filing a Notice of Withdrawal of the First Motion to Amend (withdrawing solely that motion, not the Second Motion to Amend).

of 40 C.F.R. §§ 257.1 and 257.3-4. In order to expedite this process, however, and save both parties and this Board time and resources, we are willing to modify the First Amended Complaint to remove the term "violated" or "violations" from new paragraphs 43, 46 and 49, and replace that with "exceeded" or "exceedances." This change is fully consistent with the October 3, 2013 Board Order's statement that such exceedances "may be evidence tending to show a violation of Section 21(a) of the Act." October 3, 2013 Board Order at 25. A Second Amended Complaint, with all exhibits, including that change is attached hereto as Exhibit A. In addition, a "redlined" version of the Second Amended Complaint, showing exactly what changes were made between the First Amended Complaint and the Second Amended Complaint, is attached for this Board's convenience (without exhibits) as Exhibit B.

8. Further, Citizens Groups object to MWG's argument that a fact discovery extension should be limited to written discovery, and believe the appropriate length for an extension of the fact discovery period is 45 days, rather than 60. Citizens Groups believe the appropriate venue to address the fact discovery extension is with the Hearing Officer, who in his Order of January 15, 2015, indicated that the discovery schedule may need to be revisited at our next status conference scheduled for February 5, 2015. We will submit a timely revised proposed discovery schedule to the Hearing Officer prior to that status conference.

WHEREFORE, for all of the above-mentioned reasons, Citizens Groups respectfully request leave to file the Second Amended Complaint attached hereto as Exhibit A.

Respectfully submitted,

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Attorney for CARE

Illinois Pollution Control Board
2013-015

Exhibit A

To Citizens Groups' Reply to MWG's Response to Complainants' Second Motion for Leave to File Amended Complaint

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:	)	
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	)	PCB No-2013-015
Complainants,	)	
	)	
v.	)	
	)	
MIDWEST GENERATION, LLC,	)	
	)	
Respondents	)	

SECOND AMENDED COMPLAINT

FACTUAL BACKGROUND

1. Midwest Generation, LLC ("MWG") owns and operates the Joliet #29 Generating Station ("Joliet 29") in Joliet, Illinois in Will and Kendall Counties, on the north side of the Des Plaines River. MWG has historically stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to, two or more landfills and three ash ponds (two HDPE-lined, one geocomposite-lined) on the same side of the river, and continues to store or dispose of coal ash and other coal combustion waste in these ponds or repositories.

2. MWG installed eleven groundwater monitoring wells (MW-1 through MW-11) around the Joliet 29 ash ponds in 2010, as depicted in the well map included in MWG groundwater monitoring reports for Joliet 29, attached hereto as Exhibit A. Since monitoring began in late 2010, groundwater monitoring results have shown levels of antimony, boron, chloride, iron, manganese, sulfate, and Total Dissolved Solids ("TDS") which exceed Illinois Groundwater Quality Standards ("GQSs"). *See* violations of Class I and Class II GQSs and

MWG groundwater monitoring data for Joliet 29, attached hereto as Exhibits B, C, and D, respectively.

3. MWG owns and operates the Powerton Generating Station ("Powerton") in Pekin, Illinois in Tazewell County. MWG has historically stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to three active ash ponds on the site, two of them lined; one less active ash pond on the site; up to two additional ponds or basins containing coal ash and other coal combustion waste; and a former slag dumping area. MWG continues to store or dispose of coal ash and other coal combustion waste in these ponds or repositories.

4. MWG monitors groundwater at Powerton with a network of 15 wells (MW-1 through MW-15, depicted in the well map included in MWG groundwater monitoring reports for Powerton, attached hereto as Exhibit E). Since monitoring began in late 2010, groundwater monitoring results have shown levels of antimony, arsenic, boron, chloride, iron, lead, manganese, nitrate, selenium, sulfate, thallium, and TDS which exceed Illinois GQS and/or open dumping standards. *See* violations of Class I and Class II GQSs and MWG groundwater monitoring data for Powerton, attached hereto as Exhibits B, C, and F, respectively.

5. MWG owns and operates the Waukegan Generating Station ("Waukegan") in Waukegan, Illinois in Lake County. There are two active HDPE-lined ponds at this site. MWG has stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to, these two ponds and one former ash landfill or disposal area, and continues to do so.

6. MWG installed 5 wells (MW-1 through MW-5) around the Waukegan ash ponds in 2010, as depicted in the well map included in MWG groundwater monitoring reports for

Waukegan, attached hereto as Exhibit G. Groundwater monitoring results from Waukegan show levels of antimony, arsenic, boron, chloride, iron, manganese, nitrate, selenium, pH, sulfate, and TDS which exceed Illinois GQS and/or open dumping standards. *See* violations of Class I and Class II GQSs and MWG groundwater monitoring data for Waukegan, attached hereto as Exhibits B, C, and H, respectively.

7. MWG owns and operates the Will County Generating Station ("Will County") in Romeoville, Illinois in Will County. MWG has stored and disposed of coal ash and other coal combustion waste at the site in repositories that include four geocomposite-lined ponds and two or more additional ponds. MWG continues to store and dispose of coal ash and other coal combustion waste in one or more of these ponds.

8. MWG installed 10 wells around the Will County plant's ponds in 2010 (MW-1 through MW-10; *see* the well map included in MWG groundwater monitoring reports for Will County, attached hereto as Exhibit I.) Groundwater monitoring results from Will County show levels of antimony, arsenic, boron, chloride, manganese, pH, selenium, sulfate, and TDS which exceed Illinois GQS and/or open dumping standards. *See* violations of Class I and Class II GQSs and MWG groundwater monitoring data for Will County, attached hereto as Exhibits B, C, and J, respectively.

9. On June 11, 2012, the Illinois Environmental Protection Agency ("IEPA") sent MWG Violation Notices describing violations of Section 12 of the Illinois Environmental Protection Act, 415 ILCS 5/12, and Groundwater Quality regulations at Joliet 29, Powerton, Waukegan, and Will County. *See* Violation Notices for Powerton, Joliet 29, Waukegan, and Will County, attached hereto as Exhibits K–N. In the Violation Notices IEPA identified

groundwater monitoring results that exceeded Illinois Class I GQS, which are found at 35 IAC 620.410.

THE POLLUTANTS

10. As set forth in detail in Exhibit B, groundwater monitoring results at Joliet 29, Powerton, Waukegan, and/or Will County have exceeded Illinois Class I GQS, 35 Ill. Admin. Code § 620.410, for the following pollutants: Antimony, arsenic, boron, chloride, iron, lead, manganese, mercury, nitrate, selenium, sulfate, total dissolved solids, and thallium.

11. Many of the pollutants found at elevated concentrations in the groundwater monitoring results at Joliet 29, Powerton, Waukegan, and/or Will County are constituents of coal ash.[1]

12. As MWG recognizes, boron is a primary indicator of potential coal ash impacts to groundwater.

13. The pollutants listed in this complaint, when present at the concentrations found in MWG's groundwater wells, make the groundwater unusable. Many of these pollutants are toxic and have been found at concentrations that present a human health risk. Others are dangerous to aquatic ecosystems; this is a significant concern to the extent that contaminated groundwater is migrating into adjacent surface water bodies.

14. Antimony is associated with reduced lifespan, decreased blood glucose, and altered cholesterol in rodents, and with vomiting and cardiac and respiratory effects in humans.[2] To protect public health, the U.S. EPA has established a Maximum Contaminant Level (MCL) of

[1] *See, e.g.*, U.S. EPA, Human and Ecological Risk Assessment of Coal Combustion Wastes at 2-4 (Draft, April 2000) (listing Coal Combustion Waste constituents), *available at* http://earthjustice.org/sites/default/files/library/reports/epa-coal-combustion-waste-risk-assessment.pdf (last visited October 2, 2012).

[2] *See, e.g.*, U.S. EPA, Integrated Risk Information System: Antimony, http://www.epa.gov/iris/subst/0006.htm; California EPA, Draft Public Health Goal for Antimony in Drinking Water (July 2009).

0.006 mg/L. The Illinois Class I GQS for antimony is also 0.006 mg/L. Even this level may be unsafe; the California EPA, for example, has proposed a much lower Public Health Goal of 0.0007 mg/L.[3]

15. Arsenic is known to cause multiple forms of cancer in humans and is also associated with non-cancer health effects of the skin and the nervous system.[4] Groundwater that exceeds Illinois GQSs for arsenic is highly toxic; based on current U.S. EPA risk estimates, the cancer risk associated with drinking water at 0.05 mg/L, the Illinois Class I GQS for arsenic, is greater than 2 in 1,000.[5] The risk at 0.2 mg/L, the Class II GQS, is 1 in 100.

16. Oral exposure to boron has led to developmental and reproductive toxicity in multiple species. Specific effects include testicular degeneration, reduced sperm count, reduced birth weight, and birth defects.[6] The EPA has established a child health advisory of 3 mg/L for boron, close to the Illinois Class I and Class II GQS of 2 mg/L.[7]

17. Chloride renders water unusable by imparting a salty taste; to prevent this the EPA has set a secondary drinking water regulation of 250 mg/L, close to the Illinois Class I and Class II GQS of 200 mg/L.[8]

18. Iron renders water unusable by imparting a rusty color and a metallic taste and causing sedimentation and staining; to prevent these effects the EPA has set a secondary drinking water regulation of 0.3 mg/L.[9] The Illinois Class I and II GQS for iron, at 5 mg/L, is much

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[3] *See* California EPA, *supra* note 2.
[4] *See, e.g.*, U.S. EPA, Integrated Risk Information System: Arsenic, inorganic, http://www.epa.gov/iris/subst/0278.htm; U.S. Agency for Toxic Substances and Disease Registry (ATSDR), Toxicological Profile for Arsenic (Aug. 2007).
[5] Derived from the U.S. EPA drinking water unit risk of 5E-5 per ug/L. U.S. EPA, *supra* note 8.
[6] *See, e.g.*, U.S. EPA, Toxicological Profile of Boron and Compounds 60-61 (June 2004).
[7] U.S. EPA, 2012 Edition of the Drinking Water Standards and Health Advisories (April, 2012).
[8] U.S. EPA, Secondary Drinking Water Regulations: Guidance for Nuisance Chemicals, http://water.epa.gov/drink/contaminants/secondarystandards.cfm.
[9] *Id*.

higher than the EPA secondary drinking water regulation, suggesting that violations of the GQS represent concentrations of iron far higher than what would be usable.

19. Lead is known to be toxic to the nervous system, and is particularly associated with effects on childhood neurobehavioral development at very low doses. Lead is also classified by the EPA as a "probable human carcinogen."[10] The EPA Action Level for lead in drinking water is 0.015 mg/L.[11] This is unlikely to represent a "safe" level of exposure—the EPA has noted, for example, that there may be no threshold for lead toxicity.[12] Groundwater concentrations of lead above the Illinois Class I GQS, 0.0075 mg/L, are thus unsafe to drink.

20. Manganese is also known to be toxic to the nervous system.[13] The EPA has not updated its assessment of manganese toxicity in 16 years, so EPA standards and advisories may not reflect the latest scientific knowledge concerning effects on childhood neurological development,[14] and the EPA Lifetime Health Advisory for manganese – 0.3 mg/L – may not be adequately health-protective. In any event, manganese concentrations greater than 0.05 mg/L render water unusable by discoloring the water, giving it a metallic taste, and causing black staining.[15] Groundwater with manganese above the Illinois Class I GQS – 0.15 mg/L – is clearly not usable and is likely to be toxic.

21. Inorganic mercury is toxic to the kidneys, and has also been associated with developmental toxicity.[16] The California EPA Public Health Goal for ionorganic mercury is 0.0012 mg/L; the U.S. EPA MCL, like the Illinois Class I GQS, is 0.002 mg/L.[17]

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[10] U.S. EPA, Integrated Risk Information System: Lead and Compounds, http://www.epa.gov/iris/subst/0277.htm.
[11] U.S. EPA drinking water standards, *supra* note 7.
[12] U.S. EPA, IRIS web page for lead, *supra* note 10.
[13] *See, e.g.*, U.S. EPA, Integrated Risk Information System: Manganese, http://www.epa.gov/iris/subst/0373.htm.
[14] *See, e.g.*, G.A. Wasserman et al., Water manganese exposure and children's intellectual function in araihazar, Bangladesh. 114 ENVIRON. HEALTH PERSP. 124 (2006).
[15] *See* U.S. EPA secondary drinking water regulations, *supra* note 8.
[16] *See*, e.g., California EPA, Public Health Goal for Inorganic Mercury in Drinking Water (Feb. 1999).
[17] Id.; U.S. EPA drinking water standards, *supra* note 7.

22. Nitrate is known to cause methemoglobinemia in infants, a condition that impairs oxygen delivery to tissues and can cause bluish skin coloration. The U.S. EPA MCL, the California EPA Public Health Goal, and the Illinois Class I and II GQSs are all 10 mg/L, a level at which infant methemoglobinemia is not expected to occur.[18]

23. Selenium is an essential element, but excess exposure can cause a chemical-specific condition known as selenosis, with symptoms that include hair and nail loss. Various agencies have derived health-protective values between 0.01 and 0.05 mg/L, but are in agreement that selenium concentrations above 0.05 mg/L, the Illinois Class I and II GQS, are unsafe to drink.[19]

24. High concentrations of sulfates in drinking water impart a salty taste and can cause diarrhea; to protect against these effects, the U.S. EPA has established a secondary MCL of 250 mg/L and a health-based advisory of 500 mg/L.[20] Groundwater with sulfate concentrations above the Illinois Cass I and Class II GQS of 400 mg/L is therefore unusable and potentially unsafe.

25. Total Dissolved Solids (TDS) is a measure of multiple dissolved chemicals, but because high TDS is generally associated with hardness, staining, salty taste, and deposits, the U.S. EPA has established a secondary MCL of 500 mg/L.[21] Groundwater with TDS above the Illinois Class I and Class II GQS, 1,200 mg/L, is clearly unusable.

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[18] *See* U.S. EPA, Integrated Risk Information System: Nitrate, http://www.epa.gov/iris/subst/0076.htm.; California EPA, Public Health Goals for Nitrate and Nitrite (Dec. 1997).

[19] *See, e.g.*, California EPA, Public Health Goal for Selenium (Dec. 2010) (Setting a Public Health Goal of 0.03 mg/L); World Health Organization, Guidelines for Drinking Water Quality, 4th Ed., 413 (2011) (Setting a provisional guideline of 0.04 mg/L); U.S. EPA drinking water standards, *supra* note 11 (setting forth a MCL of 0.05 mg/L).

[20] U.S. EPA, Drinking Water Advisory: Consumer Acceptability Advice and Health Effects Analysis on Sulfate (Feb. 2003).

[21] *See* U.S. EPA secondary drinking water regulations, *supra* note 8.

26. Thallium is known to cause neurotoxicity, and is also associated with developmental and reproductive toxicity and other adverse health effects. The Illinois Class I GQS and the U.S. EPA MCL are both 0.002 mg/L.[22]

27. Finally, many of the pollutants associated with coal ash, including but not limited to selenium, are known to bioaccumulate in aquatic ecosystems causing tissue damage and other effects in fish and amphibians. One review, for example, noted that "the combined effects of multiple accumulated elements may lead to numerous changes in individuals that could compromise individual fitness or health," and provided several examples of coal ash-contaminated sites where the health of individuals and communities in aquatic ecosystems had been severely impaired.[23]

PARTIES

28. Citizens Against Ruining the Environment ("CARE") is located at 230 E. 6th Street, Lockport, IL 60441. CARE is an incorporated, not-for-profit community organization with members in the Lockport area, including Will County. CARE was organized for the purpose of preserving and protecting Illinois's land, air, water, and other natural resources, and protecting the organization's members and other residents of the state from threats of pollution.

29. The Environmental Law and Policy Center ("ELPC") is an Illinois not-for-profit corporation with its principal office located at 35 East Wacker Drive, Suite 1600, Chicago, IL 60601. ELPC's mission includes advocating for the protection of water quality, and protection of public health related to water quality, throughout the Midwest.

[22] *See* U.S. EPA drinking water standards, *supra* note 7.
[23] C.L. Rowe et al., Ecotoxicological implications of aquatic disposal of coal combustion residues in the United States: A review, 80 ENVTL. MONITORING AND ASSESSMENT 207, 242 (2002); see also A.D. Lemly and J.P. Skorupa, Wildlife and the coal waste policy debate: Proposed rules or coal waste disposal ignore lessons from 45 years of wildlife poisoning, 46 ENVTL. SCI. TECH. 46 (2012).

30. Prairie Rivers Network, a nonprofit organization and a state affiliate of the National Wildlife Federation, is Illinois' statewide leader in river protection, conservation, and restoration. Prairie Rivers Network has a membership of over 700 in Illinois.

31. Sierra Club is the nation's oldest and largest grassroots environmental organization. Sierra Club is an incorporated, not-for-profit organization with headquarters located at 85 Second Street, 2nd Floor, San Francisco, CA, 94105. Sierra Club's Illinois Chapter office is located at 70 E. Lake St., Suite 1500, Chicago, IL, 60601. Sierra Club's mission is to preserve, protect, and enhance the natural environment. Sierra Club has 641,000 members, including approximately 23,000 members in Illinois.

32. Midwest Generation, LLC (MWG), is a Delaware Corporation doing business in Illinois with principal executive offices at 235 Remington Boulevard, Suite A, Bolingbrook, Illinois 60440. MWG's registered agent is C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, Illinois 60604. MWG is a subsidiary of Edison Mission Energy ("EME"), of Santa Ana, California. EME is a subsidiary of Edison International, 2244 Walnut Grove Avenue, (P.O. Box 976), Rosemead, California, 91770.

LEGAL BACKGROUND: OPEN DUMPING

33. The Illinois Environmental Protection Act prohibits "the open dumping of any waste." 415 ILCS 5/21(a). "Open dumping" is defined as "the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill." 415 ILCS 5/3.305. "Refuse" is defined as "waste." 415 ILCS 5/3.385. "Waste" is defined to include "any garbage, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural

operations" at 415 ILCS 5/3.535. "Sanitary landfills" are defined as "facilit[ies] permitted by the Agency for the disposal waste on land meeting the requirements of the Resource Conservation and Recovery Act [42 USCA § 6901 et seq.]." 415 ILCS 5/3.445. The requirements of the Resource Conservation and Recovery Act include criteria for distinguishing between sanitary landfills and open dumps. 42 USCA § 6944(a). These criteria are found in federal regulations at 40 CFR Part 257. According to 40 CFR § 257.1, facilities failing to meet, inter alia, the criterion at 40 CFR § 257.3-4 are considered prohibited open dumps.

34. 40 CFR § 257.3-4 establishes a criterion for identifying open dumps based on groundwater contamination. 40 CFR § 257.3-4 prohibits "contaminat[ion of] an underground drinking water source beyond the solid waste boundary or beyond an alternative compliance boundary." The contamination must exist beyond either the perimeter of the solid waste disposal area or beyond an alternative boundary established by the state or the courts after finding that establishing such a boundary will not result in the contamination of groundwater that may be used for drinking. 40 C.F.R. § 257.3-4.

35. Groundwater contamination for purposes of RCRA open dumping is demonstrated by an exceedance of one of the Maximum Contaminant Levels (MCLs) set forth in 40 CFR pt. 257 Appendix I (hereinafter "Appendix I MCLs"),[24] in either an actual drinking water source, or in an aquifer with less than 10,000 mg/L total dissolved solids. 40 CFR § 257.3-4. The Appendix I MCLs for the pollutants identified in this complaint are as follows:

Chemical	Appendix I MCL (40 C.F.R. Pt. 257, App. I)

[24] The open dumping MCLs in 40 CFR pt. 257 Appendix I are in some cases different from the most recent Maximum Contaminant Levels promulgated by the U.S. Environmental Protection Agency. For example, the Appendix I MCL for arsenic is 50 ug/L while the current MCL for arsenic is 10 ug/L. *See* U.S. EPA drinking water standards, *supra* note 7.

Arsenic	0.05 mg/L
Mercury	0.002 mg/L
Nitrate	10 mg/L
Selenium	0.01 mg/L

LEGAL BACKGROUND: WATER POLLUTION

36. The Illinois Environmental Protection Act prohibits "the discharge of any contaminants into the environment . . . so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources," 415 ILCS 5/12(a), and prohibits the deposition of "any contaminants upon the land in such place and manner so as to create a water pollution hazard." 415 ILCS 5/12(d). "Water pollution" is defined as the "alteration" or "discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life." 415 ILCS 5/3.545. "Waters" of the State is defined to include "all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State." 415 ILCS 5/3.550.

37. 35 Ill. Admin. Code § 620.405 prohibits "the release of any contaminant to groundwater so as to cause a groundwater quality standard set forth in this Subpart to be exceeded." 35 Ill. Admin. Code § 620.405. The Illinois Administrative Code establishes different groundwater quality standards for Class I and Class II groundwater.

38. 35 Ill. Admin. Code § 620.410 establishes Class I GQSs that cannot be exceeded in potable resource groundwater. "Potable resource groundwater" is defined as:

> Groundwater located 10 feet or more below the land surface and within: (1) The minimum setback zone of a well which serves as a potable water supply and to the bottom of such well; (2) Unconsolidated sand, gravel or sand and gravel which is 5 feet or more in thickness and that contains 12 percent or less of fines . . . ; (3) Sandstone which is 10 feet or more in thickness, or fractured carbonate which is 15 feet or more in thickness; or (4) Any geologic material which is capable of a: (A) sustained groundwater yield , from up to a 12 inch borehole, of 150 gallons per day or more from a thickness of 15 feet or less; or (B) Hydraulic conductivity of 1 x 10(-4) cm/sec or greater using one of the following test methods or its equivalent: (i) Permeameter; (ii) Slug test; or (iii) Pump test. 35 Ill. Admin. Code § 620.210(a).

39. The definition of Class I groundwater specifically excludes: Class III "special resource groundwater," Class IV "other groundwater," which includes groundwater in a zone of attenuation; and groundwater in a "groundwater management zone." 35 Ill. Admin. Code § 620.210; *see also* 35 Ill. Admin. Code §§ 620.230, 620.240, 620.250.35 Ill. Admin. Code § 620.115 provides that "No person shall cause, threaten or allow a violation of the Act, the [Illinois Groundwater Protection Act] or regulations adopted by the Board thereunder, including but not limited to this part."35 Ill. Admin. Code § 620.301(a) provides that "No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: 1) Treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or 2) An existing or potential use of such groundwater is precluded."

40. 35 Ill. Admin. Code § 620.420 establishes Class II GQSs that cannot be exceeded in general resource groundwater. "General resource groundwater" is defined as "groundwater which does not meet the provisions of . . . Class I . . . Class III . . . or . . . Class IV" and "groundwater which is found by the Board, pursuant to the petition procedures set forth in Section 620.260, to be capable of agricultural, industrial, recreational or other beneficial uses." 35 Ill. Admin. Code § 620.220. Groundwater in a zone of attenuation must meet Class II GQSs. 35 Ill. Admin. Code § 620.440(b).

The Illinois Class I and Class II GQSs for pollutants identified in this report are as follows:

Chemical	Class I GQS (mg/L) (35 Ill. Admin. Code § 620.410)	Class II GQS (mg/L) (35 IAC § 620.420)
Antimony	0.006	0.024
Arsenic	0.01	0.2
Boron	2	2
Chloride	200	200
Iron	5	5
Lead	0.0075	0.10
Manganese	0.15	10
Mercury	0.002	0.01
Nitrate	10	100
pH	6.5 – 9.0	6.5 – 9.0
Selenium	0.05	0.05
Sulfate	400	400
Thallium	0.002	0.020
Total Dissolved Solids	1,200	1,200

COUNT I

OPEN DUMPING VIOLATIONS AT POWERTON

41. Paragraphs 1-40 are realleged and incorporated herein by reference.

42. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Powerton, has caused or contributed to contamination of the groundwater beneath Powerton in violation of 415 ILCS 5/21(a), as shown in Table 1.

Table 1: Open dumping violations at Powerton.

	Well	Pollutant	Sample value (mg/L)	Appendix I MCL (mg/L)	Collection date
1	MW-1	Nitrate	11	10	9/20/11
2	MW-4	Selenium	0.013	0.010	2/27/13
3	MW-6	Arsenic	0.200	0.050	5/29/14
4	MW-7	Arsenic	0.085	0.050	3/25/11
5	MW-7	Arsenic	0.120	0.050	6/16/11
6	MW-7	Arsenic	0.180	0.050	9/20/11
7	MW-7	Arsenic	0.230	0.050	12/12/11
8	MW-7	Arsenic	0.230	0.050	3/19/12

9	MW-7	Arsenic	150	0.050	6/25/12
10	MW-7	Arsenic	180	0.050	9/18/12
11	MW-7	Arsenic	260	0.050	12/12/12
12	MW-7	Arsenic	170	0.050	2/27/13
13	MW-7	Arsenic	120	0.050	5/31/13
14	MW-7	Arsenic	220	0.050	7/31/13
15	MW-7	Arsenic	200	0.050	10/23/13
16	MW-7	Arsenic	150	0.050	3/5/14
17	MW-7	Arsenic	190	0.050	8/27/14
18	MW-9	Selenium	0.072[25]	0.010	3/25/11
19	MW-9	Selenium	0.015	0.010	2/27/13
20	MW-9	Selenium	0.016	0.010	5/30/13
21	MW-9	Selenium	0.014	0.010	7/30/13
22	MW-9	Nitrate	12	10	2/27/13
23	MW-9	Nitrate	11	10	5/30/13
24	MW-9	Nitrate	11	10	5/29/14
25	MW-11	Arsenic	0.057	0.050	3/4/14
26	MW-11	Arsenic	0.068	0.050	8/26/14
27	MW-12	Mercury	0.0096[26]	0.002	12/15/10
28	MW-14	Selenium	0.065	0.010	4/25/11
29	MW-14	Selenium	0.022	0.010	4/10/12
30	MW-14	Selenium	0.150	0.010	2/27/13
31	MW-14	Selenium	0.020	0.010	3/4/14
32	MW-14	Selenium	0.014	0.010	5/28/14
33	MW-15	Selenium	0.017	0.010	4/25/11
34	MW-15	Selenium	0.025	0.010	4/10/12
35	MW-15	Selenium	0.013	0.010	10/23/13
36	MW-15	Selenium	0.033	0.010	5/28/14

43. Groundwater samples from nine different wells at Powerton have exceeded the Appendix I MCLs on the thirty-six occasions delineated in Table 1.

COUNT 2

OPEN DUMPING VIOLATIONS AT WAUKEGAN

44. Paragraphs 1-43 are realleged and incorporated herein by reference.

[25] This value was originally reported as 0.072 mg/L. *See* letter from Richard M. Frendt, Patrick Engineering, to IEPA, Attachment A (July 30, 2012) (transmitting amended groundwater monitoring report for Midwest generation's Powerton Generating Station). MidGen has since revised the value to 0.0072 mg/L. *Id*. at Attachments B and C.

[26] This value was originally reported as 0.0096 ug/L. *Id*. at Attachment A. MidGen has since revised the value to nondetect. *Id*. at Attachments B and C.

45. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Waukegan, has caused or contributed to contamination of the groundwater beneath Waukegan in violation of 415 ILCS 5/21(a), as shown in Table 2.

Table 2: Open dumping violations at Waukegan.

	Well	Pollutant	Sample value (mg/L)	Appendix I MCL (mg/L)	Collection date
1	MW-1	Arsenic	0.054	0.050	10/25/10
2	MW-1	Arsenic	0.170	0.050	6/13/11
3	MW-1	Arsenic	0.077	0.050	9/13/11
4	MW-1	Arsenic	0.057	0.050	12/6/11
5	MW-1	Arsenic	0.078	0.050	3/14/12
6	MW-1	Arsenic	0.070	0.050	6/18/12
7	MW-1	Arsenic	0.070	0.050	9/28/12
8	MW-1	Arsenic	0.091	0.050	12/19/12
9	MW-1	Arsenic	0.098	0.050	3/7/13
10	MW-1	Arsenic	0.055	0.050	7/25/13
6	MW-1	Selenium	0.031	0.010	10/25/10
7	MW-1	Selenium	0.030	0.010	3/24/11
8	MW-1	Selenium	0.016	0.010	6/13/11
9	MW-1	Selenium	0.039	0.010	9/13/11
10	MW-1	Selenium	0.032	0.010	12/6/11
11	MW-1	Selenium	0.037	0.010	3/14/12
12	MW-1	Selenium	0.013	0.010	6/18/12
13	MW-1	Selenium	0.056	0.010	3/7/13
14	MW-1	Selenium	0.043	0.010	6/7/13
15	MW-1	Selenium	0.031	0.010	7/25/13
16	MW-1	Selenium	0.013	0.010	11/4/13
17	MW-2	Selenium	0.026	0.010	10/25/10
18	MW-2	Selenium	0.028	0.010	6/13/11
19	MW-2	Selenium	0.022	0.010	9/13/11
20	MW-2	Selenium	0.015	0.010	7/25/13
21	MW-3	Selenium	0.016	0.010	3/24/11
22	MW-3	Selenium	0.030	0.010	6/13/11
23	MW-3	Selenium	0.012	0.010	9/13/11
24	MW-3	Selenium	0.011	0.010	12/6/11
25	MW-3	Selenium	0.011	0.010	3/7/13
26	MW-3	Selenium	0.067	0.010	6/7/13
27	MW-3	Nitrate	13	10	6/7/13
28	MW-4	Selenium	0.022	0.010	6/13/11
29	MW-4	Selenium	0.025	0.010	9/13/11

30	MW-4	Selenium	0.015	0.010	12/6/11
31	MW-4	Selenium	0.028	0.010	6/6/13
32	MW-4	Selenium	0.050	0.010	7/25/13
33	MW-4	Selenium	0.011	0.010	11/4/13

46. Groundwater samples at four of five wells monitored showed exceedances of the Appendix I MCLs on the thirty-three occasions delineated in Table 2.

COUNT 3

OPEN DUMPING VIOLATIONS AT WILL COUNTY

47. Paragraphs 1-46 are realleged and incorporated herein by reference.

48. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and other coal combustion waste repositories at Will County, has caused or contributed to contamination of the groundwater beneath Will County in violation of 415 ILCS 5/21(a), as shown in Table 3.

Table 3: Open dumping violations at Will County

	Well	Pollutant	Sample value (mg/L)	Appendix I MCL (mg/L)	Collection date
1	MW-4	Selenium	0.015	0.010	3/5/13
2	MW-5	Selenium	0.017	0.010	12/13/10
3	MW-5	Selenium	0.014	0.010	3/28/11
4	MW-5	Selenium	0.016	0.010	6/15/11
5	MW-5	Selenium	0.017	0.010	9/24/12
6	MW-5	Selenium	0.026	0.010	6/5/13
7	MW-5	Selenium	0.170	0.010	10/28/13
8	MW-5	Selenium	0.024	0.010	2/13/14
9	MW-6	Selenium	0.011	0.010	9/15/11
10	MW-6	Selenium	0.014	0.010	9/24/12
11	MW-8	Selenium	0.015	0.010	10/28/13

49. As Table 3 shows, there have been eleven exceedances of the open dumping MCL for selenium since monitoring began in late 2010.

COUNT 4

WATER POLLUTION AT JOLIET 29

50. Paragraphs 1-49 are realleged and incorporated herein by reference.

51. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Joliet 29, has discharged contaminants into the environment at Joliet 29 and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and D, there have been at least 156 violations of Illinois Class I Groundwater Quality Standards and at least 132 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

52. Since 2010, the groundwater at Joliet 29 has exceeded the Class I GQSs for antimony, boron, chloride, iron, manganese, sulfate, and TDS, and the Class II GQSs for boron, chloride, iron, sulfate, and TDS. *See* Exhibits B, C, and D.

COUNT 5

WATER POLLUTION AT POWERTON

53. Paragraphs 1-52 are realleged and incorporated herein by reference.

54. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Powerton, has discharged contaminants into the environment at Powerton and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and F, there have been at least 445 violations of Illinois Class I

Groundwater Quality Standards and at least 216 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

55. Since 2010, the groundwater at Powerton has exceeded the Class I GQSs for antimony, arsenic, boron, chloride, iron, manganese, nitrate, selenium, sulfate, thallium, and TDS, and the Class II GQSs for arsenic, boron, chloride, iron, manganese, selenium, sulfate, and TDS. *See* Exhibits B, C, and F.

COUNT 6

WATER POLLUTION AT WAUKEGAN

56. Paragraphs 1-55 are realleged and incorporated herein by reference.

57. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Waukegan, has discharged contaminants into the environment at Waukegan and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and H, there have been at least 155 violations of Illinois Class I Groundwater Quality Standards and 105 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

58. Since 2010, the groundwater at Waukegan has exceeded the Class I GQSs for antimony, arsenic, boron, chloride, iron, manganese, nitrate, selenium, pH, sulfate, and TDS, and the Class II GQSs for boron, chloride, iron, pH, selenium, sulfate, and TDS. *See* Exhibits B, C, and H.

COUNT 7

WATER POLLUTION AT WILL COUNTY

59. Paragraphs 1-58 are realleged and incorporated herein by reference.

60. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Will County, has discharged contaminants into the environment at Will County and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and J, there have been at least 297 violations of Illinois Class I Groundwater Quality Standards and at least 214 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

61. Since 2010, the groundwater at Will County has exceeded the Class I GQSs for antimony, arsenic, boron, chloride, manganese, pH, sulfate, and TDS, and the Class II GQSs for boron, chloride, pH, selenium, sulfate, and TDS. *See* Exhibits B, C, and J.

RELIEF REQUESTED

WHEREFORE, Petitioners request that this Board:

1. Declare that Respondent, Midwest Generation, LLC has violated the Illinois Environmental Protection Act's prohibitions on open dumping and groundwater pollution at its Joliet 29, Powerton, Waukegan, and Will County sites.
2. Impose civil penalties under 415 ILCS 5/42.
3. Order Respondent, under 415 ILCS 5/33, to:
    - Cease and desist from open dumping of coal ash and coal combustion waste and from causing or threatening to cause water pollution,
    - Modify its coal ash and coal combustion waste disposal and storage practices so as to avoid future groundwater contamination,
    - Remediate the contaminated groundwater so that it meets applicable Illinois groundwater standards; and

4. Grant such other relief as the Board deems just and proper.

Respectfully submitted,

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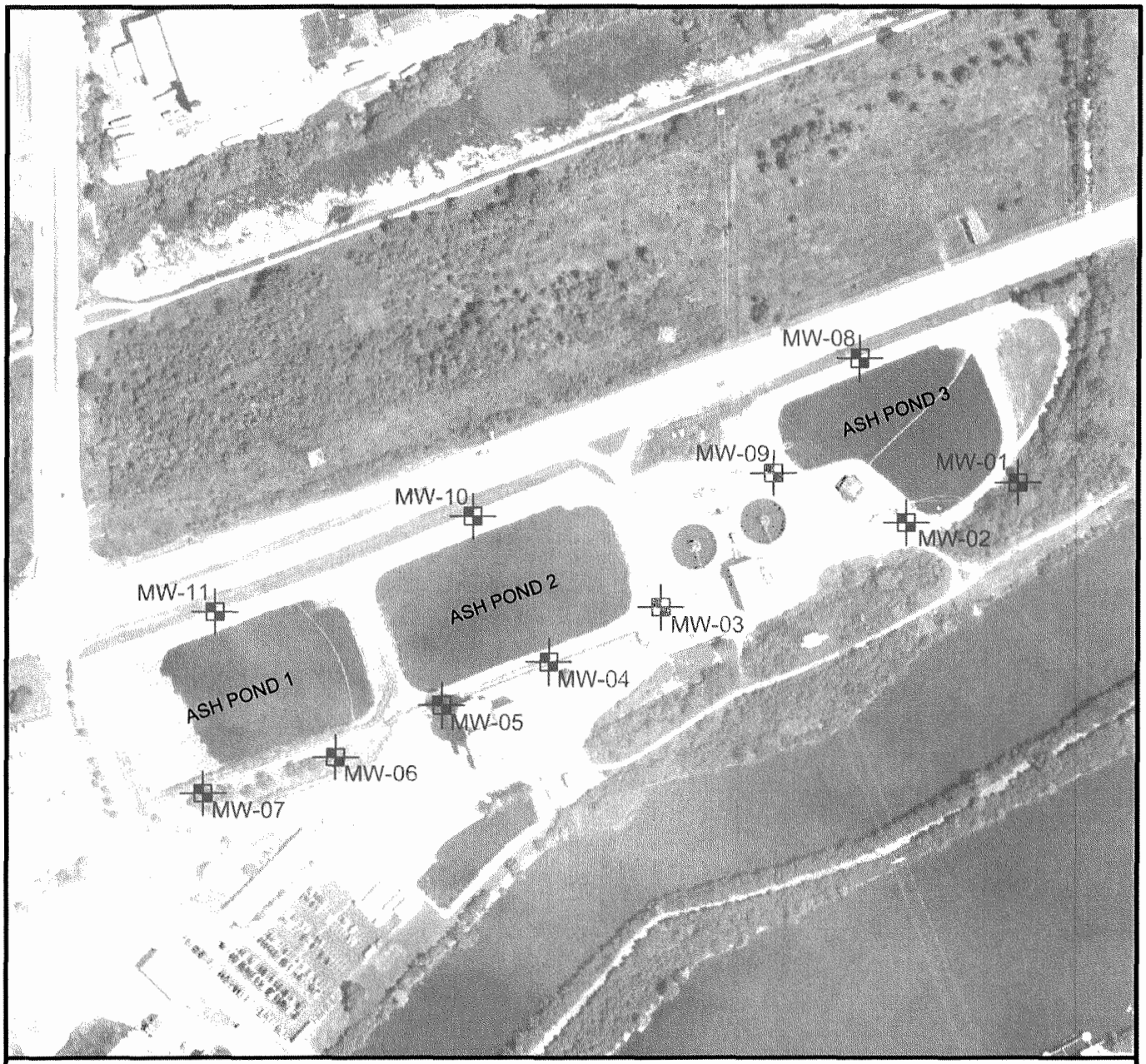
EXHIBIT A: Map of groundwater monitoring wells at Joliet 29.

Excerpted from Midwest Generation, LLC, Hydrogeologic Assessment Report – Joliet Generating Station No. 29 (Feb. 2011).



LEGEND

MW-01 Monitoring Well Location (November 2010)

N

0 300'

GRAPHIC SCALE

AERIAL IMAGE SOURCE:
LANDISCOR AERIAL INFORMATION INC., JULY 2008

Date: FEB. 2011	FIGURE 3 MONITORING WELL LOCATION MAP	PATRICK ENGINEERING INC.
Proj No.: 21053.070	JOLIET STATION NO. 29 JOLIET, ILLINOIS	4970 Varsity Drive Lisle, Illinois 60532-4101 TEL. (630) 795-7200 FAX (630) 724-1681
App. By: RMF		PROFESSIONAL DESIGN FIRM LICENSE NO. 184-000409

EXHIBIT B: Violations of Illinois Class I Groundwater Quality Standards at Joliet 29, Powerton, Waukegan, and Will County Generating Stations.

Exhibit B: Violations of Illinois Class I groundwater standards at Midwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. Highlighted violations were not listed in the Violation Notices sent by Illinois EPA in June, 2012. This table does not include pH violations.

violation number	Plant	Well	Pollutant	Sample value (mg/L)	Class I GW standard (mg/L)	Collection date
1	Joliet 29	MW-1	chloride	210	200	5/23/2013
2	Joliet 29	MW-10	chloride	300	200	3/28/2011
3	Joliet 29	MW-10	chloride	290	200	6/19/2012
4	Joliet 29	MW-10	chloride	230	200	9/19/2012
5	Joliet 29	MW-10	chloride	210	200	3/5/2013
6	Joliet 29	MW-10	chloride	240	200	5/22/2013
7	Joliet 29	MW-10	chloride	210	200	7/23/2013
8	Joliet 29	MW-10	chloride	220	200	10/15/2013
9	Joliet 29	MW-10	chloride	240	200	2/17/2014
10	Joliet 29	MW-10	chloride	300	200	5/1/2014
11	Joliet 29	MW-11	boron	2.6	2.0	3/28/2011
12	Joliet 29	MW-11	boron	2.2	2.0	6/14/2011
13	Joliet 29	MW-11	chloride	270	200	3/28/2011
14	Joliet 29	MW-11	chloride	280	200	6/14/2011
15	Joliet 29	MW-11	chloride	240	200	3/15/2012
16	Joliet 29	MW-11	chloride	430	200	2/21/2014
17	Joliet 29	MW-11	chloride	340	200	5/1/2014
18	Joliet 29	MW-2	antimony	0.0120	0.0060	12/6/2010
19	Joliet 29	MW-2	chloride	230	200	6/14/2011
20	Joliet 29	MW-2	chloride	280	200	3/15/2012
21	Joliet 29	MW-2	chloride	260	200	3/5/2013
22	Joliet 29	MW-2	chloride	250	200	5/23/2013
23	Joliet 29	MW-2	chloride	310	200	7/22/2013
24	Joliet 29	MW-2	chloride	240	200	2/21/2014
25	Joliet 29	MW-2	chloride	350	200	5/2/2014
26	Joliet 29	MW-2	chloride	280	200	8/18/2014
27	Joliet 29	MW-3	antimony	0.0065	0.0060	9/14/2011
28	Joliet 29	MW-3	antimony	0.0160	0.0060	12/7/2011
29	Joliet 29	MW-3	antimony	0.0130	0.0060	3/15/2012
30	Joliet 29	MW-3	chloride	260	200	12/7/2010
31	Joliet 29	MW-3	chloride	240	200	3/28/2011
32	Joliet 29	MW-3	chloride	300	200	6/14/2011
33	Joliet 29	MW-3	chloride	260	200	12/7/2011
34	Joliet 29	MW-3	chloride	250	200	3/15/2012
35	Joliet 29	MW-3	chloride	260	200	6/19/2012
36	Joliet 29	MW-3	chloride	330	200	9/19/2012
37	Joliet 29	MW-3	chloride	290	200	12/20/2012
38	Joliet 29	MW-3	chloride	260	200	3/5/2013
39	Joliet 29	MW-3	chloride	380	200	5/22/2013
40	Joliet 29	MW-3	chloride	210	200	7/22/2013
41	Joliet 29	MW-3	chloride	250	200	10/15/2013
42	Joliet 29	MW-3	chloride	200	200	2/17/2014
43	Joliet 29	MW-3	chloride	300	200	5/2/2014
44	Joliet 29	MW-3	chloride	220	200	8/18/2014
45	Joliet 29	MW-3	TDS	1,300	1,200	5/22/2013
46	Joliet 29	MW-4	antimony	0.0067	0.0060	12/7/2011
47	Joliet 29	MW-4	antimony	0.0120	0.0060	5/22/2013
48	Joliet 29	MW-4	chloride	270	200	12/6/2010
49	Joliet 29	MW-4	chloride	270	200	3/28/2011

Exhibit B: Violations of Illinois Class I groundwater standards at Midwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. Highlighted violations were not listed in the Violation Notices sent by Illinois EPA in June, 2012. This table does not include pH violations.

50	Joliet 29	MW-4	chloride	250	200	6/14/2011
51	Joliet 29	MW-4	chloride	210	200	3/15/2012
52	Joliet 29	MW-4	chloride	270	200	6/19/2012
53	Joliet 29	MW-4	chloride	260	200	9/19/2012
54	Joliet 29	MW-4	chloride	250	200	12/20/2012
55	Joliet 29	MW-4	chloride	230	200	3/5/2013
56	Joliet 29	MW-4	chloride	270	200	5/22/2013
57	Joliet 29	MW-4	chloride	210	200	10/16/2013
58	Joliet 29	MW-4	chloride	220	200	2/21/2014
59	Joliet 29	MW-4	chloride	270	200	5/1/2014
60	Joliet 29	MW-4	chloride	210	200	8/18/2014
61	Joliet 29	MW-4	manganese	0.330	0.150	12/6/2010
62	Joliet 29	MW-5	chloride	240	200	3/28/2011
63	Joliet 29	MW-5	chloride	220	200	6/14/2011
64	Joliet 29	MW-5	chloride	210	200	3/15/2012
65	Joliet 29	MW-5	chloride	220	200	6/19/2012
66	Joliet 29	MW-5	chloride	240	200	9/19/2012
67	Joliet 29	MW-5	chloride	210	200	12/20/2012
68	Joliet 29	MW-5	chloride	230	200	3/5/2013
69	Joliet 29	MW-5	chloride	240	200	2/21/2014
70	Joliet 29	MW-5	chloride	370	200	5/1/2014
71	Joliet 29	MW-6	chloride	270	200	3/28/2011
72	Joliet 29	MW-6	chloride	240	200	3/15/2012
73	Joliet 29	MW-6	chloride	210	200	6/19/2012
74	Joliet 29	MW-6	chloride	370	200	2/21/2014
75	Joliet 29	MW-6	chloride	340	200	5/2/2014
76	Joliet 29	MW-7	chloride	430	200	12/6/2010
77	Joliet 29	MW-7	chloride	320	200	3/28/2011
78	Joliet 29	MW-7	chloride	300	200	3/15/2012
79	Joliet 29	MW-7	chloride	470	200	2/21/2014
80	Joliet 29	MW-7	chloride	350	200	5/2/2014
81	Joliet 29	MW-7	manganese	0.290	0.150	12/6/2010
82	Joliet 29	MW-8	chloride	350	200	3/28/2011
83	Joliet 29	MW-8	chloride	410	200	3/15/2012
84	Joliet 29	MW-8	chloride	300	200	5/23/2013
85	Joliet 29	MW-8	chloride	210	200	7/22/2013
86	Joliet 29	MW-8	chloride	270	200	2/21/2014
87	Joliet 29	MW-8	chloride	780	200	5/1/2014
88	Joliet 29	MW-8	sulfate	460	400	5/1/2014
89	Joliet 29	MW-8	TDS	2,100	1,200	5/1/2014
90	Joliet 29	MW-9	chloride	230	200	3/28/2011
91	Joliet 29	MW-9	chloride	290	200	6/14/2011
92	Joliet 29	MW-9	chloride	250	200	6/19/2012
93	Joliet 29	MW-9	chloride	290	200	5/23/2013
94	Joliet 29	MW-9	chloride	280	200	7/22/2013
95	Joliet 29	MW-9	chloride	280	200	10/15/2013
96	Joliet 29	MW-9	chloride	270	200	2/17/2014
97	Joliet 29	MW-9	chloride	340	200	5/1/2014
98	Joliet 29	MW-9	chloride	270	200	8/18/2014
99	Joliet 29	MW-9	iron	7.3	5.0	6/14/2011
100	Joliet 29	MW-9	iron	5.5	5.0	3/15/2012
101	Joliet 29	MW-9	iron	8.0	5.0	6/19/2012

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102	Joliet 29	MW-9	iron	13.0	5.0	12/20/2012
103	Joliet 29	MW-9	iron	15.0	5.0	3/5/2013
104	Joliet 29	MW-9	iron	160.0	5.0	5/23/2013
105	Joliet 29	MW-9	iron	50.0	5.0	7/22/2013
106	Joliet 29	MW-9	iron	25.0	5.0	10/15/2013
107	Joliet 29	MW-9	iron	12.0	5.0	2/17/2014
108	Joliet 29	MW-9	iron	8.4	5.0	5/1/2014
109	Joliet 29	MW-9	iron	130.0	5.0	8/18/2014
110	Joliet 29	MW-9	manganese	1.100	0.150	12/6/2010
111	Joliet 29	MW-9	manganese	1.600	0.150	3/28/2011
112	Joliet 29	MW-9	manganese	0.950	0.150	6/14/2011
113	Joliet 29	MW-9	manganese	0.820	0.150	9/14/2011
114	Joliet 29	MW-9	manganese	0.660	0.150	12/7/2011
115	Joliet 29	MW-9	manganese	1.300	0.150	3/15/2012
116	Joliet 29	MW-9	manganese	1.200	0.150	6/19/2012
117	Joliet 29	MW-9	manganese	0.680	0.150	9/19/2012
118	Joliet 29	MW-9	manganese	0.440	0.150	12/20/2012
119	Joliet 29	MW-9	manganese	0.430	0.150	3/5/2013
120	Joliet 29	MW-9	manganese	1.600	0.150	5/23/2013
121	Joliet 29	MW-9	manganese	0.810	0.150	7/22/2013
122	Joliet 29	MW-9	manganese	0.520	0.150	10/15/2013
123	Joliet 29	MW-9	manganese	0.340	0.150	2/17/2014
124	Joliet 29	MW-9	manganese	0.300	0.150	5/1/2014
125	Joliet 29	MW-9	manganese	0.720	0.150	8/18/2014
126	Joliet 29	MW-9	sulfate	1,600	400	12/6/2010
127	Joliet 29	MW-9	sulfate	1,100	400	3/28/2011
128	Joliet 29	MW-9	sulfate	580	400	6/14/2011
129	Joliet 29	MW-9	sulfate	750	400	9/14/2011
130	Joliet 29	MW-9	sulfate	1,600	400	3/15/2012
131	Joliet 29	MW-9	sulfate	1,500	400	6/19/2012
132	Joliet 29	MW-9	sulfate	1,600	400	9/19/2012
133	Joliet 29	MW-9	sulfate	1,100	400	12/20/2012
134	Joliet 29	MW-9	sulfate	700	400	3/5/2013
135	Joliet 29	MW-9	sulfate	1,300	400	5/23/2013
136	Joliet 29	MW-9	sulfate	1,000	400	7/22/2013
137	Joliet 29	MW-9	sulfate	680	400	10/15/2013
138	Joliet 29	MW-9	sulfate	560	400	2/17/2014
139	Joliet 29	MW-9	sulfate	560	400	5/1/2014
140	Joliet 29	MW-9	sulfate	880	400	8/18/2014
141	Joliet 29	MW-9	TDS	2,600	1,200	12/6/2010
142	Joliet 29	MW-9	TDS	2,400	1,200	3/28/2011
143	Joliet 29	MW-9	TDS	1,500	1,200	6/14/2011
144	Joliet 29	MW-9	TDS	1,700	1,200	9/14/2011
145	Joliet 29	MW-9	TDS	2,400	1,200	12/7/2011
146	Joliet 29	MW-9	TDS	2,600	1,200	3/15/2012
147	Joliet 29	MW-9	TDS	2,800	1,200	6/19/2012
148	Joliet 29	MW-9	TDS	2,900	1,200	9/19/2012
149	Joliet 29	MW-9	TDS	2,000	1,200	12/20/2012
150	Joliet 29	MW-9	TDS	1,700	1,200	3/5/2013
151	Joliet 29	MW-9	TDS	3,000	1,200	5/23/2013
152	Joliet 29	MW-9	TDS	2,300	1,200	7/22/2013
153	Joliet 29	MW-9	TDS	1,700	1,200	10/15/2013

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154	Joliet 29	MW-9	TDS	1,600	1,200	2/17/2014
155	Joliet 29	MW-9	TDS	1,700	1,200	5/1/2014
156	Joliet 29	MW-9	TDS	2,100	1,200	8/18/2014
157	Powerton	MW-1	nitrate	11	10	9/20/2011
158	Powerton	MW-10	boron	2.10	2.0	3/6/2014
159	Powerton	MW-10	boron	3.20	2.0	5/30/2014
160	Powerton	MW-10	manganese	2.100	0.150	12/15/2010
161	Powerton	MW-10	manganese	2.800	0.150	3/25/2011
162	Powerton	MW-10	manganese	3.800	0.150	6/16/2011
163	Powerton	MW-10	manganese	2.300	0.150	9/20/2011
164	Powerton	MW-10	manganese	2.300	0.150	12/12/2011
165	Powerton	MW-10	manganese	2.300	0.150	3/19/2012
166	Powerton	MW-10	manganese	2.600	0.150	6/25/2012
167	Powerton	MW-10	manganese	2.500	0.150	9/18/2012
168	Powerton	MW-10	manganese	2.200	0.150	12/12/2012
169	Powerton	MW-10	manganese	1.900	0.150	2/27/2013
170	Powerton	MW-10	manganese	3.200	0.150	5/29/2013
171	Powerton	MW-10	manganese	1.500	0.150	7/31/2013
172	Powerton	MW-10	manganese	2.000	0.150	10/23/2013
173	Powerton	MW-10	manganese	3.100	0.150	3/6/2014
174	Powerton	MW-10	manganese	1.600	0.150	5/30/2014
175	Powerton	MW-10	manganese	2.100	0.150	8/28/2014
176	Powerton	MW-11	arsenic	0.0300	0.0100	12/12/2012
177	Powerton	MW-11	arsenic	0.0450	0.0100	2/27/2013
178	Powerton	MW-11	arsenic	0.0280	0.0100	5/30/2013
179	Powerton	MW-11	arsenic	0.0380	0.0100	7/30/2013
180	Powerton	MW-11	arsenic	0.0380	0.0100	10/22/2013
181	Powerton	MW-11	arsenic	0.0570	0.0100	3/4/2014
182	Powerton	MW-11	arsenic	0.0360	0.0100	5/29/2014
183	Powerton	MW-11	arsenic	0.0680	0.0100	8/26/2014
184	Powerton	MW-11	boron	2.30	2.0	3/19/2012
185	Powerton	MW-11	boron	2.60	2.0	9/18/2012
186	Powerton	MW-11	iron	5.80	5.0	3/4/2014
187	Powerton	MW-11	iron	5.50	5.0	8/26/2014
188	Powerton	MW-11	manganese	3.200	0.150	12/16/2010
189	Powerton	MW-11	manganese	3.600	0.150	2/15/2011
190	Powerton	MW-11	manganese	2.900	0.150	6/16/2011
191	Powerton	MW-11	manganese	2.200	0.150	9/19/2011
192	Powerton	MW-11	manganese	2.500	0.150	12/12/2011
193	Powerton	MW-11	manganese	2.900	0.150	3/19/2012
194	Powerton	MW-11	manganese	3.700	0.150	6/25/2012
195	Powerton	MW-11	manganese	4.700	0.150	9/18/2012
196	Powerton	MW-11	manganese	12.000	0.150	12/12/2012
197	Powerton	MW-11	manganese	11.000	0.150	2/27/2013
198	Powerton	MW-11	manganese	7.500	0.150	5/30/2013
199	Powerton	MW-11	manganese	8.000	0.150	7/30/2013
200	Powerton	MW-11	manganese	7.300	0.150	10/22/2013
201	Powerton	MW-11	manganese	7.900	0.150	3/4/2014
202	Powerton	MW-11	manganese	8.000	0.150	5/29/2014
203	Powerton	MW-11	manganese	8.400	0.150	8/26/2014
204	Powerton	MW-12	arsenic	0.0130	0.0100	2/15/2011
205	Powerton	MW-12	arsenic	0.0140	0.0100	6/25/2012

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206	Powerton	MW-12	arsenic	0.0110	0.0100	9/18/2012
207	Powerton	MW-12	arsenic	0.0220	0.0100	12/12/2012
208	Powerton	MW-12	arsenic	0.0160	0.0100	7/29/2013
209	Powerton	MW-12	arsenic	0.0180	0.0100	10/22/2013
210	Powerton	MW-12	boron	3.70	2.0	5/30/2013
211	Powerton	MW-12	chloride	210	200	12/12/2011
212	Powerton	MW-12	chloride	210	200	12/12/2012
213	Powerton	MW-12	chloride	220	200	3/4/2014
214	Powerton	MW-12	chloride	220	200	5/29/2014
215	Powerton	MW-12	chloride	210	200	8/26/2014
216	Powerton	MW-12	iron	5.50	5.0	12/16/2010
217	Powerton	MW-12	iron	6.30	5.0	2/15/2011
218	Powerton	MW-12	iron	5.60	5.0	6/16/2011
219	Powerton	MW-12	iron	8.20	5.0	6/25/2012
220	Powerton	MW-12	iron	8.90	5.0	9/18/2012
221	Powerton	MW-12	iron	6.40	5.0	12/12/2012
222	Powerton	MW-12	iron	5.80	5.0	2/27/2013
223	Powerton	MW-12	iron	8.90	5.0	5/30/2013
224	Powerton	MW-12	manganese	0.320	0.150	12/16/2010
225	Powerton	MW-12	manganese	0.580	0.150	2/15/2011
226	Powerton	MW-12	manganese	0.260	0.150	6/16/2011
227	Powerton	MW-12	manganese	0.370	0.150	9/19/2011
228	Powerton	MW-12	manganese	0.250	0.150	12/12/2011
229	Powerton	MW-12	manganese	0.710	0.150	6/25/2012
230	Powerton	MW-12	manganese	0.640	0.150	9/18/2012
231	Powerton	MW-12	manganese	1.700	0.150	12/12/2012
232	Powerton	MW-12	manganese	0.380	0.150	2/27/2013
233	Powerton	MW-12	manganese	0.240	0.150	5/30/2013
234	Powerton	MW-12	manganese	1.300	0.150	7/29/2013
235	Powerton	MW-12	manganese	1.500	0.150	10/22/2013
236	Powerton	MW-12	manganese	0.230	0.150	3/4/2014
237	Powerton	MW-12	manganese	0.650	0.150	5/29/2014
238	Powerton	MW-12	manganese	1.200	0.150	8/26/2014
239	Powerton	MW-12	sulfate	430	400	6/25/2012
240	Powerton	MW-12	sulfate	410	400	5/30/2013
241	Powerton	MW-12	sulfate	420	400	7/29/2013
242	Powerton	MW-12	sulfate	530	400	3/4/2014
243	Powerton	MW-12	sulfate	560	400	5/29/2014
244	Powerton	MW-12	TDS	1,400	1,200	3/4/2014
245	Powerton	MW-12	TDS	1,300	1,200	5/29/2014
246	Powerton	MW-13	arsenic	0.0110	0.0100	12/15/2010
247	Powerton	MW-13	arsenic	0.0230	0.0100	12/12/2011
248	Powerton	MW-13	arsenic	0.0270	0.0100	4/10/2012
249	Powerton	MW-13	arsenic	0.0410	0.0100	12/14/2012
250	Powerton	MW-13	arsenic	0.0290	0.0100	2/28/2013
251	Powerton	MW-13	arsenic	0.0310	0.0100	5/30/2013
252	Powerton	MW-13	arsenic	0.0290	0.0100	7/30/2013
253	Powerton	MW-13	arsenic	0.0240	0.0100	10/22/2013
254	Powerton	MW-13	arsenic	0.0280	0.0100	3/4/2014
255	Powerton	MW-13	arsenic	0.0240	0.0100	5/28/2014
256	Powerton	MW-13	arsenic	0.0310	0.0100	8/27/2014
257	Powerton	MW-13	boron	3.90	2.0	12/15/2010

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258	Powerton	MW-13	boron	3.10	2.0	2/15/2011
259	Powerton	MW-13	boron	2.60	2.0	4/25/2011
260	Powerton	MW-13	boron	3.00	2.0	6/16/2011
261	Powerton	MW-13	boron	2.70	2.0	8/9/2011
262	Powerton	MW-13	boron	3.00	2.0	10/13/2011
263	Powerton	MW-13	boron	4.10	2.0	12/12/2011
264	Powerton	MW-13	boron	4.00	2.0	4/10/2012
265	Powerton	MW-13	boron	3.60	2.0	12/14/2012
266	Powerton	MW-13	boron	4.20	2.0	2/28/2013
267	Powerton	MW-13	boron	3.80	2.0	7/30/2013
268	Powerton	MW-13	boron	3.50	2.0	10/22/2013
269	Powerton	MW-13	boron	2.90	2.0	3/4/2014
270	Powerton	MW-13	boron	3.50	2.0	5/28/2014
271	Powerton	MW-13	boron	3.00	2.0	8/27/2014
272	Powerton	MW-13	chloride	210	200	12/14/2012
273	Powerton	MW-13	manganese	5.000	0.150	12/15/2010
274	Powerton	MW-13	manganese	3.800	0.150	2/15/2011
275	Powerton	MW-13	manganese	2.700	0.150	4/25/2011
276	Powerton	MW-13	manganese	2.900	0.150	6/16/2011
277	Powerton	MW-13	manganese	2.600	0.150	8/9/2011
278	Powerton	MW-13	manganese	3.600	0.150	10/13/2011
279	Powerton	MW-13	manganese	3.500	0.150	12/12/2011
280	Powerton	MW-13	manganese	3.500	0.150	4/10/2012
281	Powerton	MW-13	manganese	3.700	0.150	12/14/2012
282	Powerton	MW-13	manganese	3.500	0.150	2/28/2013
283	Powerton	MW-13	manganese	3.800	0.150	5/30/2013
284	Powerton	MW-13	manganese	4.000	0.150	7/30/2013
285	Powerton	MW-13	manganese	2.800	0.150	10/22/2013
286	Powerton	MW-13	manganese	2.900	0.150	3/4/2014
287	Powerton	MW-13	manganese	3.400	0.150	5/28/2014
288	Powerton	MW-13	manganese	3.500	0.150	8/27/2014
289	Powerton	MW-13	sulfate	1,400	400	12/15/2010
290	Powerton	MW-13	sulfate	770	400	2/15/2011
291	Powerton	MW-13	sulfate	580	400	4/25/2011
292	Powerton	MW-13	sulfate	540	400	6/16/2011
293	Powerton	MW-13	sulfate	440	400	8/9/2011
294	Powerton	MW-13	sulfate	660	400	10/13/2011
295	Powerton	MW-13	sulfate	1,100	400	12/12/2011
296	Powerton	MW-13	sulfate	1,100	400	4/10/2012
297	Powerton	MW-13	sulfate	1,100	400	12/14/2012
298	Powerton	MW-13	sulfate	730	400	2/28/2013
299	Powerton	MW-13	sulfate	880	400	5/30/2013
300	Powerton	MW-13	sulfate	1,000	400	7/30/2013
301	Powerton	MW-13	sulfate	690	400	10/22/2013
302	Powerton	MW-13	sulfate	660	400	3/4/2014
303	Powerton	MW-13	sulfate	630	400	5/28/2014
304	Powerton	MW-13	sulfate	740	400	8/27/2014
305	Powerton	MW-13	TDS	2,600	1,200	12/15/2010
306	Powerton	MW-13	TDS	1,600	1,200	2/15/2011
307	Powerton	MW-13	TDS	1,400	1,200	4/25/2011
308	Powerton	MW-13	TDS	1,300	1,200	6/16/2011
309	Powerton	MW-13	TDS	1,500	1,200	10/13/2011

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310	Powerton	MW-13	TDS	2,100	1,200	12/12/2011
311	Powerton	MW-13	TDS	2,300	1,200	4/10/2012
312	Powerton	MW-13	TDS	1,900	1,200	12/14/2012
313	Powerton	MW-13	TDS	1,600	1,200	2/28/2013
314	Powerton	MW-13	TDS	2,000	1,200	5/30/2013
315	Powerton	MW-13	TDS	2,000	1,200	7/30/2013
316	Powerton	MW-13	TDS	1,700	1,200	10/22/2013
317	Powerton	MW-13	TDS	1,900	1,200	3/4/2014
318	Powerton	MW-13	TDS	2,100	1,200	5/28/2014
319	Powerton	MW-13	TDS	2,300	1,200	8/27/2014
320	Powerton	MW-14	arsenic	0.0240	0.0100	12/15/2010
321	Powerton	MW-14	arsenic	0.0190	0.0100	2/15/2011
322	Powerton	MW-14	arsenic	0.0150	0.0100	10/13/2011
323	Powerton	MW-14	chloride	240	200	8/9/2011
324	Powerton	MW-14	chloride	220	200	3/4/2014
325	Powerton	MW-14	iron	12.00	5.0	12/14/2012
326	Powerton	MW-14	manganese	0.680	0.150	12/15/2010
327	Powerton	MW-14	manganese	0.810	0.150	2/15/2011
328	Powerton	MW-14	manganese	0.290	0.150	4/25/2011
329	Powerton	MW-14	manganese	0.360	0.150	6/16/2011
330	Powerton	MW-14	manganese	0.570	0.150	8/9/2011
331	Powerton	MW-14	manganese	0.840	0.150	10/13/2011
332	Powerton	MW-14	manganese	0.630	0.150	4/10/2012
333	Powerton	MW-14	manganese	0.720	0.150	5/30/2013
334	Powerton	MW-14	manganese	0.320	0.150	7/30/2013
335	Powerton	MW-14	manganese	1.200	0.150	10/23/2013
336	Powerton	MW-14	manganese	1.300	0.150	3/4/2014
337	Powerton	MW-14	manganese	0.340	0.150	5/28/2014
338	Powerton	MW-14	manganese	1.800	0.150	8/28/2014
339	Powerton	MW-14	selenium	0.065	0.050	4/25/2011
340	Powerton	MW-14	selenium	0.150	0.050	2/27/2013
341	Powerton	MW-14	sulfate	960	400	12/15/2010
342	Powerton	MW-14	sulfate	820	400	2/15/2011
343	Powerton	MW-14	sulfate	770	400	4/25/2011
344	Powerton	MW-14	sulfate	810	400	6/16/2011
345	Powerton	MW-14	sulfate	940	400	8/9/2011
346	Powerton	MW-14	sulfate	850	400	10/13/2011
347	Powerton	MW-14	sulfate	880	400	12/12/2011
348	Powerton	MW-14	sulfate	990	400	4/10/2012
349	Powerton	MW-14	sulfate	810	400	12/14/2012
350	Powerton	MW-14	sulfate	800	400	5/30/2013
351	Powerton	MW-14	sulfate	900	400	7/30/2013
352	Powerton	MW-14	sulfate	840	400	10/23/2013
353	Powerton	MW-14	sulfate	680	400	3/4/2014
354	Powerton	MW-14	sulfate	720	400	5/28/2014
355	Powerton	MW-14	sulfate	1,100	400	8/28/2014
356	Powerton	MW-14	TDS	1,800	1,200	12/15/2010
357	Powerton	MW-14	TDS	1,700	1,200	2/15/2011
358	Powerton	MW-14	TDS	1,800	1,200	4/25/2011
359	Powerton	MW-14	TDS	1,900	1,200	6/16/2011
360	Powerton	MW-14	TDS	2,000	1,200	8/9/2011
361	Powerton	MW-14	TDS	1,800	1,200	10/13/2011

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362	Powerton	MW-14	TDS	1,800	1,200	12/12/2011
363	Powerton	MW-14	TDS	2,200	1,200	4/10/2012
364	Powerton	MW-14	TDS	1,700	1,200	12/14/2012
365	Powerton	MW-14	TDS	1,300	1,200	2/27/2013
366	Powerton	MW-14	TDS	2,000	1,200	5/30/2013
367	Powerton	MW-14	TDS	2,100	1,200	7/30/2013
368	Powerton	MW-14	TDS	2,100	1,200	10/23/2013
369	Powerton	MW-14	TDS	1,900	1,200	3/4/2014
370	Powerton	MW-14	TDS	1,700	1,200	5/28/2014
371	Powerton	MW-14	TDS	2,400	1,200	8/28/2014
372	Powerton	MW-14	thallium	0.004	0.002	4/25/2011
373	Powerton	MW-14	thallium	0.004	0.002	6/16/2011
374	Powerton	MW-14	thallium	0.003	0.002	8/9/2011
375	Powerton	MW-14	thallium	0.003	0.002	4/10/2012
376	Powerton	MW-14	thallium	0.003	0.002	12/14/2012
377	Powerton	MW-14	thallium	0.003	0.002	5/30/2013
378	Powerton	MW-14	thallium	0.004	0.002	7/30/2013
379	Powerton	MW-14	thallium	0.002	0.002	10/23/2013
380	Powerton	MW-14	thallium	0.002	0.002	3/4/2014
381	Powerton	MW-14	thallium	0.003	0.002	5/28/2014
382	Powerton	MW-14	thallium	0.002	0.002	8/28/2014
383	Powerton	MW-15	arsenic	0.0110	0.0100	10/13/2011
384	Powerton	MW-15	arsenic	0.0110	0.0100	12/14/2012
385	Powerton	MW-15	chloride	210	200	8/9/2011
386	Powerton	MW-15	chloride	220	200	12/14/2012
387	Powerton	MW-15	chloride	210	200	5/30/2013
388	Powerton	MW-15	chloride	220	200	7/30/2013
389	Powerton	MW-15	chloride	210	200	10/23/2013
390	Powerton	MW-15	chloride	240	200	3/6/2014
391	Powerton	MW-15	chloride	220	200	5/28/2014
392	Powerton	MW-15	chloride	240	200	8/27/2014
393	Powerton	MW-15	manganese	0.560	0.150	12/15/2010
394	Powerton	MW-15	manganese	0.420	0.150	2/15/2011
395	Powerton	MW-15	manganese	0.360	0.150	4/25/2011
396	Powerton	MW-15	manganese	0.600	0.150	6/16/2011
397	Powerton	MW-15	manganese	0.370	0.150	8/9/2011
398	Powerton	MW-15	manganese	0.480	0.150	10/13/2011
399	Powerton	MW-15	manganese	0.390	0.150	12/12/2011
400	Powerton	MW-15	manganese	0.250	0.150	4/10/2012
401	Powerton	MW-15	manganese	0.510	0.150	12/14/2012
402	Powerton	MW-15	manganese	0.350	0.150	2/28/2013
403	Powerton	MW-15	manganese	0.270	0.150	5/30/2013
404	Powerton	MW-15	manganese	0.300	0.150	7/30/2013
405	Powerton	MW-15	manganese	0.430	0.150	10/23/2013
406	Powerton	MW-15	manganese	0.590	0.150	3/6/2014
407	Powerton	MW-15	manganese	0.300	0.150	5/28/2014
408	Powerton	MW-15	manganese	0.950	0.150	8/27/2014
409	Powerton	MW-15	sulfate	650	400	6/16/2011
410	Powerton	MW-15	sulfate	570	400	5/30/2013
411	Powerton	MW-15	sulfate	460	400	7/30/2013
412	Powerton	MW-15	sulfate	420	400	10/23/2013
413	Powerton	MW-15	sulfate	620	400	8/27/2014

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414	Powerton	MW-15	TDS	1,600	1,200	6/16/2011
415	Powerton	MW-15	TDS	1,700	1,200	5/30/2013
416	Powerton	MW-15	TDS	1,400	1,200	7/30/2013
417	Powerton	MW-15	TDS	1,400	1,200	10/23/2013
418	Powerton	MW-15	TDS	1,300	1,200	3/6/2014
419	Powerton	MW-15	TDS	1,300	1,200	5/28/2014
420	Powerton	MW-15	TDS	1,800	1,200	8/27/2014
421	Powerton	MW-16	chloride	230	200	3/3/2014
422	Powerton	MW-16	nitrate	18	10	12/12/2012
423	Powerton	MW-16	nitrate	23	10	2/28/2013
424	Powerton	MW-16	nitrate	20	10	5/29/2013
425	Powerton	MW-16	nitrate	13	10	7/29/2013
426	Powerton	MW-16	nitrate	19	10	10/22/2013
427	Powerton	MW-16	nitrate	16	10	3/3/2014
428	Powerton	MW-16	nitrate	21	10	5/30/2014
429	Powerton	MW-16	nitrate	22	10	8/26/2014
430	Powerton	MW-2	antimony	0.0150	0.0060	5/29/2013
431	Powerton	MW-2	boron	2.70	2.0	10/21/2013
432	Powerton	MW-4	manganese	0.680	0.150	3/25/2011
433	Powerton	MW-4	manganese	0.410	0.150	6/16/2011
434	Powerton	MW-4	manganese	0.690	0.150	9/20/2011
435	Powerton	MW-4	manganese	0.350	0.150	12/12/2011
436	Powerton	MW-4	manganese	0.260	0.150	6/25/2012
437	Powerton	MW-4	manganese	0.500	0.150	9/18/2012
438	Powerton	MW-4	manganese	0.270	0.150	10/21/2013
439	Powerton	MW-4	manganese	0.240	0.150	8/25/2014
440	Powerton	MW-5	manganese	0.510	0.150	12/15/2010
441	Powerton	MW-5	manganese	0.490	0.150	3/25/2011
442	Powerton	MW-5	manganese	0.480	0.150	6/16/2011
443	Powerton	MW-5	manganese	0.640	0.150	9/20/2011
444	Powerton	MW-5	manganese	0.500	0.150	12/12/2011
445	Powerton	MW-5	manganese	0.260	0.150	3/19/2012
446	Powerton	MW-5	manganese	0.410	0.150	6/25/2012
447	Powerton	MW-5	manganese	1.000	0.150	9/18/2012
448	Powerton	MW-5	manganese	0.590	0.150	12/12/2012
449	Powerton	MW-5	manganese	0.210	0.150	2/27/2013
450	Powerton	MW-5	manganese	0.670	0.150	5/29/2013
451	Powerton	MW-5	manganese	0.290	0.150	7/31/2013
452	Powerton	MW-5	manganese	0.620	0.150	10/21/2013
453	Powerton	MW-6	arsenic	0.2000	0.0100	5/29/2014
454	Powerton	MW-6	chloride	210	200	9/20/2011
455	Powerton	MW-6	chloride	240	200	12/12/2012
456	Powerton	MW-6	chloride	210	200	10/23/2013
457	Powerton	MW-6	chloride	230	200	3/6/2014
458	Powerton	MW-6	chloride	230	200	5/29/2014
459	Powerton	MW-6	chloride	230	200	8/27/2014
460	Powerton	MW-6	iron	22.00	5.0	5/29/2014
461	Powerton	MW-6	manganese	0.680	0.150	12/15/2010
462	Powerton	MW-6	manganese	0.680	0.150	3/25/2011
463	Powerton	MW-6	manganese	0.630	0.150	6/16/2011
464	Powerton	MW-6	manganese	0.660	0.150	9/20/2011
465	Powerton	MW-6	manganese	0.630	0.150	12/12/2011

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466	Powerton	MW-6	manganese	0.610	0.150	3/19/2012
467	Powerton	MW-6	manganese	0.710	0.150	6/25/2012
468	Powerton	MW-6	manganese	0.640	0.150	9/18/2012
469	Powerton	MW-6	manganese	0.610	0.150	12/12/2012
470	Powerton	MW-6	manganese	0.500	0.150	2/27/2013
471	Powerton	MW-6	manganese	1.300	0.150	5/29/2013
472	Powerton	MW-6	manganese	0.700	0.150	7/31/2013
473	Powerton	MW-6	manganese	0.580	0.150	10/23/2013
474	Powerton	MW-6	manganese	0.680	0.150	3/6/2014
475	Powerton	MW-6	manganese	8.000	0.150	5/29/2014
476	Powerton	MW-6	manganese	0.710	0.150	8/27/2014
477	Powerton	MW-6	sulfate	450	400	6/25/2012
478	Powerton	MW-6	sulfate	440	400	12/12/2012
479	Powerton	MW-6	sulfate	560	400	5/29/2013
480	Powerton	MW-6	sulfate	440	400	7/31/2013
481	Powerton	MW-6	sulfate	410	400	3/6/2014
482	Powerton	MW-6	sulfate	530	400	5/29/2014
483	Powerton	MW-6	TDS	1,300	1,200	6/25/2012
484	Powerton	MW-6	TDS	1,400	1,200	5/29/2013
485	Powerton	MW-6	TDS	1,400	1,200	5/29/2014
486	Powerton	MW-6	TDS	1,300	1,200	8/27/2014
487	Powerton	MW-7	arsenic	0.0260	0.0100	12/6/2010
488	Powerton	MW-7	arsenic	0.0850	0.0100	3/25/2011
489	Powerton	MW-7	arsenic	0.1200	0.0100	6/16/2011
490	Powerton	MW-7	arsenic	0.1800	0.0100	9/20/2011
491	Powerton	MW-7	arsenic	0.2300	0.0100	12/12/2011
492	Powerton	MW-7	arsenic	0.2300	0.0100	3/19/2012
493	Powerton	MW-7	arsenic	0.1500	0.0100	6/25/2012
494	Powerton	MW-7	arsenic	0.1800	0.0100	9/18/2012
495	Powerton	MW-7	arsenic	0.2600	0.0100	12/12/2012
496	Powerton	MW-7	arsenic	0.1700	0.0100	2/27/2013
497	Powerton	MW-7	arsenic	0.1200	0.0100	5/31/2013
498	Powerton	MW-7	arsenic	0.2200	0.0100	7/31/2013
499	Powerton	MW-7	arsenic	0.2000	0.0100	10/23/2013
500	Powerton	MW-7	arsenic	0.1500	0.0100	3/5/2014
501	Powerton	MW-7	arsenic	0.1900	0.0100	8/27/2014
502	Powerton	MW-7	iron	8.00	5.0	12/6/2010
503	Powerton	MW-7	iron	7.50	5.0	3/25/2011
504	Powerton	MW-7	iron	10.00	5.0	6/16/2011
505	Powerton	MW-7	iron	22.00	5.0	9/20/2011
506	Powerton	MW-7	iron	26.00	5.0	12/12/2011
507	Powerton	MW-7	iron	31.00	5.0	3/19/2012
508	Powerton	MW-7	iron	10.00	5.0	6/25/2012
509	Powerton	MW-7	iron	21.00	5.0	9/18/2012
510	Powerton	MW-7	iron	18.00	5.0	12/12/2012
511	Powerton	MW-7	iron	27.00	5.0	2/27/2013
512	Powerton	MW-7	iron	15.00	5.0	5/31/2013
513	Powerton	MW-7	iron	30.00	5.0	7/31/2013
514	Powerton	MW-7	iron	20.00	5.0	10/23/2013
515	Powerton	MW-7	iron	17.00	5.0	3/5/2014
516	Powerton	MW-7	iron	14.00	5.0	8/27/2014
517	Powerton	MW-7	manganese	3.500	0.150	12/6/2010

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518	Powerton	MW-7	manganese	5.900	0.150	3/25/2011
519	Powerton	MW-7	manganese	6.400	0.150	6/16/2011
520	Powerton	MW-7	manganese	12.000	0.150	9/20/2011
521	Powerton	MW-7	manganese	12.000	0.150	12/12/2011
522	Powerton	MW-7	manganese	11.000	0.150	3/19/2012
523	Powerton	MW-7	manganese	9.300	0.150	6/25/2012
524	Powerton	MW-7	manganese	8.000	0.150	9/18/2012
525	Powerton	MW-7	manganese	6.700	0.150	12/12/2012
526	Powerton	MW-7	manganese	9.500	0.150	2/27/2013
527	Powerton	MW-7	manganese	5.700	0.150	5/31/2013
528	Powerton	MW-7	manganese	11.000	0.150	7/31/2013
529	Powerton	MW-7	manganese	5.900	0.150	10/23/2013
530	Powerton	MW-7	manganese	5.800	0.150	3/5/2014
531	Powerton	MW-7	manganese	0.330	0.150	5/29/2014
532	Powerton	MW-7	manganese	6.600	0.150	8/27/2014
533	Powerton	MW-7	sulfate	530	400	5/29/2014
534	Powerton	MW-7	TDS	1,300	1,200	6/16/2011
535	Powerton	MW-7	TDS	1,300	1,200	9/20/2011
536	Powerton	MW-7	TDS	1,300	1,200	12/12/2011
537	Powerton	MW-7	TDS	1,400	1,200	3/19/2012
538	Powerton	MW-7	TDS	1,300	1,200	6/25/2012
539	Powerton	MW-7	TDS	1,300	1,200	9/18/2012
540	Powerton	MW-7	TDS	1,300	1,200	7/31/2013
541	Powerton	MW-7	TDS	1,400	1,200	5/29/2014
542	Powerton	MW-7	TDS	1,300	1,200	8/27/2014
543	Powerton	MW-8	chloride	210	200	3/25/2011
544	Powerton	MW-8	chloride	210	200	9/20/2011
545	Powerton	MW-8	chloride	210	200	9/18/2012
546	Powerton	MW-8	chloride	220	200	12/12/2012
547	Powerton	MW-8	chloride	230	200	5/30/2013
548	Powerton	MW-8	chloride	220	200	7/31/2013
549	Powerton	MW-8	chloride	260	200	10/23/2013
550	Powerton	MW-8	chloride	230	200	3/3/2014
551	Powerton	MW-8	chloride	340	200	5/28/2014
552	Powerton	MW-8	chloride	380	200	8/27/2014
553	Powerton	MW-8	iron	6.50	5.0	2/27/2013
554	Powerton	MW-8	iron	6.60	5.0	7/31/2013
555	Powerton	MW-8	manganese	0.270	0.150	3/25/2011
556	Powerton	MW-8	manganese	0.290	0.150	6/16/2011
557	Powerton	MW-8	manganese	0.180	0.150	9/20/2011
558	Powerton	MW-8	manganese	0.200	0.150	12/12/2011
559	Powerton	MW-8	manganese	0.270	0.150	3/19/2012
560	Powerton	MW-8	manganese	0.200	0.150	6/25/2012
561	Powerton	MW-8	manganese	0.200	0.150	9/18/2012
562	Powerton	MW-8	manganese	0.230	0.150	12/12/2012
563	Powerton	MW-8	manganese	0.430	0.150	2/27/2013
564	Powerton	MW-8	manganese	0.250	0.150	5/30/2013
565	Powerton	MW-8	manganese	0.480	0.150	7/31/2013
566	Powerton	MW-8	manganese	0.160	0.150	10/23/2013
567	Powerton	MW-8	manganese	0.200	0.150	3/3/2014
568	Powerton	MW-8	manganese	0.700	0.150	5/28/2014
569	Powerton	MW-8	manganese	0.170	0.150	8/27/2014

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570	Powerton	MW-8	sulfate	440	400	6/25/2012
571	Powerton	MW-8	sulfate	460	400	5/30/2013
572	Powerton	MW-8	TDS	1,300	1,200	5/30/2013
573	Powerton	MW-8	TDS	1,300	1,200	7/31/2013
574	Powerton	MW-8	TDS	1,300	1,200	10/23/2013
575	Powerton	MW-8	TDS	1,400	1,200	5/28/2014
576	Powerton	MW-8	TDS	1,400	1,200	8/27/2014
577	Powerton	MW-9	boron	2.10	2.0	12/16/2010
578	Powerton	MW-9	boron	2.50	2.0	9/20/2011
579	Powerton	MW-9	boron	2.70	2.0	12/12/2011
580	Powerton	MW-9	boron	2.60	2.0	3/19/2012
581	Powerton	MW-9	boron	2.60	2.0	6/25/2012
582	Powerton	MW-9	boron	2.90	2.0	9/18/2012
583	Powerton	MW-9	boron	3.20	2.0	12/12/2012
584	Powerton	MW-9	boron	4.30	2.0	2/27/2013
585	Powerton	MW-9	boron	3.20	2.0	5/30/2013
586	Powerton	MW-9	boron	2.50	2.0	7/30/2013
587	Powerton	MW-9	boron	2.50	2.0	5/29/2014
588	Powerton	MW-9	boron	2.40	2.0	8/26/2014
589	Powerton	MW-9	iron	24.00	5.0	2/27/2013
590	Powerton	MW-9	manganese	0.230	0.150	12/16/2010
591	Powerton	MW-9	manganese	0.450	0.150	3/25/2011
592	Powerton	MW-9	manganese	0.480	0.150	6/16/2011
593	Powerton	MW-9	manganese	0.280	0.150	12/12/2011
594	Powerton	MW-9	manganese	0.220	0.150	3/19/2012
595	Powerton	MW-9	manganese	0.340	0.150	6/25/2012
596	Powerton	MW-9	manganese	0.190	0.150	2/27/2013
597	Powerton	MW-9	manganese	0.840	0.150	3/3/2014
598	Powerton	MW-9	manganese	0.360	0.150	5/29/2014
599	Powerton	MW-9	nitrate	12	10	2/27/2013
600	Powerton	MW-9	nitrate	11	10	5/30/2013
601	Powerton	MW-9	nitrate	11	10	5/29/2014
602	Waukegan	MW-1	arsenic	0.0540	0.0100	10/25/2010
603	Waukegan	MW-1	arsenic	0.1700	0.0100	6/13/2011
604	Waukegan	MW-1	arsenic	0.0770	0.0100	9/13/2011
605	Waukegan	MW-1	arsenic	0.0570	0.0100	12/6/2011
606	Waukegan	MW-1	arsenic	0.0780	0.0100	3/14/2012
607	Waukegan	MW-1	arsenic	0.0700	0.0100	6/18/2012
608	Waukegan	MW-1	arsenic	0.0700	0.0100	9/28/2012
609	Waukegan	MW-1	arsenic	0.0910	0.0100	12/19/2012
610	Waukegan	MW-1	arsenic	0.0980	0.0100	3/7/2013
611	Waukegan	MW-1	arsenic	0.0360	0.0100	6/7/13
612	Waukegan	MW-1	arsenic	0.0550	0.0100	7/25/2013
613	Waukegan	MW-1	arsenic	0.0460	0.0100	11/4/2013
614	Waukegan	MW-1	boron	2.60	2.0	10/25/2010
615	Waukegan	MW-1	boron	2.60	2.0	6/13/2011
616	Waukegan	MW-1	boron	2.50	2.0	9/13/2011
617	Waukegan	MW-1	boron	2.80	2.0	12/6/2011
618	Waukegan	MW-1	boron	2.50	2.0	3/14/2012
619	Waukegan	MW-1	boron	2.20	2.0	3/7/2013
620	Waukegan	MW-1	boron	2.20	2.0	6/7/13
621	Waukegan	MW-1	boron	2.30	2.0	7/25/2013

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622	Waukegan	MW-1	boron	3.10	2.0	11/4/2013
623	Waukegan	MW-1	selenium	0.056	0.050	3/7/2013
624	Waukegan	MW-2	antimony	0.0150	0.0060	10/25/2010
625	Waukegan	MW-2	arsenic	0.0250	0.0100	10/25/2010
626	Waukegan	MW-2	arsenic	0.0160	0.0100	3/24/2011
627	Waukegan	MW-2	arsenic	0.0110	0.0100	6/18/2012
628	Waukegan	MW-2	arsenic	0.0110	0.0100	9/28/2012
629	Waukegan	MW-2	arsenic	0.0120	0.0100	3/7/2013
630	Waukegan	MW-2	boron	2.20	2.0	10/25/2010
631	Waukegan	MW-2	boron	2.20	2.0	3/24/2011
632	Waukegan	MW-2	boron	2.60	2.0	6/18/2012
633	Waukegan	MW-2	boron	2.10	2.0	9/28/2012
634	Waukegan	MW-2	boron	2.20	2.0	3/7/2013
635	Waukegan	MW-2	boron	2.10	2.0	7/25/2013
636	Waukegan	MW-2	boron	2.20	2.0	11/4/2013
637	Waukegan	MW-3	arsenic	0.0110	0.0100	12/19/2012
638	Waukegan	MW-3	boron	2.20	2.0	3/24/2011
639	Waukegan	MW-3	boron	2.30	2.0	6/13/2011
640	Waukegan	MW-3	boron	2.50	2.0	6/7/2013
641	Waukegan	MW-3	nitrate	13	10	6/7/2013
642	Waukegan	MW-3	selenium	0.067	0.050	6/7/2013
643	Waukegan	MW-4	boron	2.10	2.0	3/24/2011
644	Waukegan	MW-4	boron	2.10	2.0	12/6/2011
645	Waukegan	MW-4	boron	2.20	2.0	3/14/2012
646	Waukegan	MW-4	boron	2.50	2.0	6/18/2012
647	Waukegan	MW-4	boron	2.20	2.0	9/28/2012
648	Waukegan	MW-4	boron	2.50	2.0	12/19/2012
649	Waukegan	MW-4	boron	2.40	2.0	3/7/2013
650	Waukegan	MW-4	boron	2.30	2.0	6/6/2013
651	Waukegan	MW-4	boron	2.50	2.0	7/25/2013
652	Waukegan	MW-4	boron	2.80	2.0	11/4/2013
653	Waukegan	MW-4	manganese	0.360	0.150	9/13/2011
654	Waukegan	MW-5	arsenic	0.0120	0.0100	9/28/2012
655	Waukegan	MW-5	arsenic	0.0110	0.0100	12/19/2012
656	Waukegan	MW-5	arsenic	0.0120	0.0100	3/7/2013
657	Waukegan	MW-5	boron	28.00	2.0	10/25/2010
658	Waukegan	MW-5	boron	33.00	2.0	3/24/2011
659	Waukegan	MW-5	boron	12.00	2.0	6/13/2011
660	Waukegan	MW-5	boron	30.00	2.0	9/13/2011
661	Waukegan	MW-5	boron	37.00	2.0	12/6/2011
662	Waukegan	MW-5	boron	44.00	2.0	3/14/2012
663	Waukegan	MW-5	boron	47.00	2.0	6/18/2012
664	Waukegan	MW-5	boron	41.00	2.0	9/28/2012
665	Waukegan	MW-5	boron	27.00	2.0	12/19/2012
666	Waukegan	MW-5	boron	33.00	2.0	3/7/2013
667	Waukegan	MW-5	boron	12.00	2.0	6/6/2013
668	Waukegan	MW-5	boron	29.00	2.0	7/25/2013
669	Waukegan	MW-5	boron	32.00	2.0	11/5/2013
670	Waukegan	MW-5	chloride	540	200	6/13/2011
671	Waukegan	MW-5	chloride	220	200	9/13/2011
672	Waukegan	MW-5	chloride	220	200	12/19/2012
673	Waukegan	MW-5	chloride	600	200	6/6/2013

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674	Waukegan	MW-5	chloride	210	200	7/25/2013
675	Waukegan	MW-5	iron	5.60	5.0	12/6/2011
676	Waukegan	MW-5	iron	6.60	5.0	3/14/2012
677	Waukegan	MW-5	iron	5.90	5.0	6/18/2012
678	Waukegan	MW-5	iron	5.10	5.0	9/28/2012
679	Waukegan	MW-5	manganese	0.710	0.150	10/25/2010
680	Waukegan	MW-5	manganese	0.600	0.150	3/24/2011
681	Waukegan	MW-5	manganese	0.280	0.150	6/13/2011
682	Waukegan	MW-5	manganese	0.990	0.150	12/6/2011
683	Waukegan	MW-5	manganese	0.760	0.150	3/14/2012
684	Waukegan	MW-5	manganese	0.750	0.150	6/18/2012
685	Waukegan	MW-5	manganese	0.570	0.150	9/28/2012
686	Waukegan	MW-5	manganese	0.480	0.150	12/19/2012
687	Waukegan	MW-5	manganese	0.510	0.150	3/7/2013
688	Waukegan	MW-5	manganese	0.170	0.150	6/6/2013
689	Waukegan	MW-5	manganese	0.440	0.150	7/25/2013
690	Waukegan	MW-5	manganese	0.540	0.150	11/5/2013
691	Waukegan	MW-5	sulfate	920	400	10/25/2010
692	Waukegan	MW-5	sulfate	780	400	3/24/2011
693	Waukegan	MW-5	sulfate	1,100	400	6/13/2011
694	Waukegan	MW-5	sulfate	810	400	9/13/2011
695	Waukegan	MW-5	sulfate	1,100	400	12/6/2011
696	Waukegan	MW-5	sulfate	980	400	3/14/2012
697	Waukegan	MW-5	sulfate	800	400	6/18/2012
698	Waukegan	MW-5	sulfate	710	400	9/28/2012
699	Waukegan	MW-5	sulfate	550	400	12/19/2012
700	Waukegan	MW-5	sulfate	650	400	3/7/2013
701	Waukegan	MW-5	sulfate	1,200	400	6/6/2013
702	Waukegan	MW-5	sulfate	890	400	7/25/2013
703	Waukegan	MW-5	sulfate	870	400	11/5/2013
704	Waukegan	MW-5	TDS	1,500	1,200	10/25/2010
705	Waukegan	MW-5	TDS	1,800	1,200	3/24/2011
706	Waukegan	MW-5	TDS	3,300	1,200	6/13/2011
707	Waukegan	MW-5	TDS	2,300	1,200	9/13/2011
708	Waukegan	MW-5	TDS	2,300	1,200	12/6/2011
709	Waukegan	MW-5	TDS	2,000	1,200	3/14/2012
710	Waukegan	MW-5	TDS	2,000	1,200	6/18/2012
711	Waukegan	MW-5	TDS	1,900	1,200	9/28/2012
712	Waukegan	MW-5	TDS	1,800	1,200	12/19/2012
713	Waukegan	MW-5	TDS	1,600	1,200	3/7/2013
714	Waukegan	MW-5	TDS	3,500	1,200	6/6/2013
715	Waukegan	MW-5	TDS	2,000	1,200	7/25/2013
716	Waukegan	MW-5	TDS	1,600	1,200	11/5/2013
717	Waukegan	MW-6	boron	2.80	2.0	3/7/2013
718	Waukegan	MW-6	boron	6.70	2.0	6/6/2013
719	Waukegan	MW-6	boron	4.30	2.0	7/25/2013
720	Waukegan	MW-6	boron	2.40	2.0	11/5/2013
721	Waukegan	MW-6	iron	6.20	5.0	6/6/2013
722	Waukegan	MW-6	iron	16.00	5.0	7/25/2013
723	Waukegan	MW-6	manganese	0.210	0.150	12/19/2012
724	Waukegan	MW-6	manganese	0.360	0.150	3/7/2013
725	Waukegan	MW-6	manganese	0.750	0.150	6/6/2013

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726	Waukegan	MW-6	manganese	0.720	0.150	7/25/2013
727	Waukegan	MW-6	manganese	0.440	0.150	11/5/2013
728	Waukegan	MW-7	arsenic	0.0120	0.0100	3/7/2013
729	Waukegan	MW-7	arsenic	0.0100	0.0100	6/6/2013
730	Waukegan	MW-7	arsenic	0.0110	0.0100	7/25/2013
731	Waukegan	MW-7	arsenic	0.0120	0.0100	11/4/2013
732	Waukegan	MW-7	boron	43.00	2.0	12/19/2012
733	Waukegan	MW-7	boron	49.00	2.0	3/7/2013
734	Waukegan	MW-7	boron	42.00	2.0	6/6/2013
735	Waukegan	MW-7	boron	44.00	2.0	7/25/2013
736	Waukegan	MW-7	boron	45.00	2.0	11/4/2013
737	Waukegan	MW-7	iron	12.00	5.0	12/19/2012
738	Waukegan	MW-7	iron	12.00	5.0	3/7/2013
739	Waukegan	MW-7	iron	13.00	5.0	6/6/2013
740	Waukegan	MW-7	iron	13.00	5.0	7/25/2013
741	Waukegan	MW-7	iron	13.00	5.0	11/4/2013
742	Waukegan	MW-7	manganese	0.460	0.150	12/19/2012
743	Waukegan	MW-7	manganese	0.490	0.150	3/7/2013
744	Waukegan	MW-7	manganese	0.480	0.150	6/6/2013
745	Waukegan	MW-7	manganese	0.460	0.150	7/25/2013
746	Waukegan	MW-7	manganese	0.460	0.150	11/4/2013
747	Waukegan	MW-7	sulfate	630	400	12/19/2012
748	Waukegan	MW-7	sulfate	710	400	3/7/2013
749	Waukegan	MW-7	sulfate	650	400	6/6/2013
750	Waukegan	MW-7	sulfate	860	400	7/25/2013
751	Waukegan	MW-7	sulfate	770	400	11/4/2013
752	Waukegan	MW-7	TDS	1,800	1,200	12/19/2012
753	Waukegan	MW-7	TDS	1,800	1,200	3/7/2013
754	Waukegan	MW-7	TDS	1,800	1,200	6/6/2013
755	Waukegan	MW-7	TDS	1,800	1,200	7/25/2013
756	Waukegan	MW-7	TDS	1,800	1,200	11/4/2013
757	Will County	MW-1	antimony	0.0063	0.0060	12/8/2011
758	Will County	MW-1	boron	2.10	2.0	6/20/2012
759	Will County	MW-1	boron	2.40	2.0	5/23/2013
760	Will County	MW-1	boron	2.30	2.0	8/14/2013
761	Will County	MW-1	boron	2.60	2.0	10/29/2013
762	Will County	MW-1	boron	2.40	2.0	2/20/2014
763	Will County	MW-1	boron	2.50	2.0	5/20/2014
764	Will County	MW-1	chloride	210	200	3/28/2011
765	Will County	MW-1	chloride	220	200	3/5/2013
766	Will County	MW-1	manganese	0.200	0.150	12/13/2010
767	Will County	MW-1	manganese	0.220	0.150	6/15/2011
768	Will County	MW-1	manganese	0.160	0.150	9/15/2011
769	Will County	MW-1	manganese	0.170	0.150	12/8/2011
770	Will County	MW-1	manganese	0.160	0.150	3/16/2012
771	Will County	MW-1	manganese	0.160	0.150	6/20/2012
772	Will County	MW-1	manganese	0.180	0.150	12/18/2012
773	Will County	MW-1	manganese	0.170	0.150	3/5/2013
774	Will County	MW-1	manganese	0.220	0.150	8/14/2013
775	Will County	MW-1	manganese	0.280	0.150	10/29/2013
776	Will County	MW-1	manganese	0.300	0.150	2/20/2014
777	Will County	MW-1	manganese	0.260	0.150	5/20/2014

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778	Will County	MW-1	manganese	0.240	0.150	8/13/2014
779	Will County	MW-1	sulfate	530	400	12/13/2010
780	Will County	MW-1	sulfate	430	400	3/16/2012
781	Will County	MW-1	sulfate	460	400	5/23/2013
782	Will County	MW-1	sulfate	540	400	8/14/2013
783	Will County	MW-1	sulfate	430	400	10/29/2013
784	Will County	MW-1	TDS	1,300	1,200	8/14/2013
785	Will County	MW-1	TDS	1,300	1,200	10/29/2013
786	Will County	MW-1	TDS	1,300	1,200	2/20/2014
787	Will County	MW-10	arsenic	0.0120	0.0100	10/28/2013
788	Will County	MW-10	boron	2.10	2.0	12/13/2010
789	Will County	MW-10	boron	2.20	2.0	6/15/2011
790	Will County	MW-10	boron	2.80	2.0	9/15/2011
791	Will County	MW-10	boron	2.50	2.0	12/8/2011
792	Will County	MW-10	boron	2.10	2.0	3/16/2012
793	Will County	MW-10	boron	2.10	2.0	6/20/2012
794	Will County	MW-10	boron	3.20	2.0	9/24/2012
795	Will County	MW-10	boron	2.70	2.0	12/18/2012
796	Will County	MW-10	boron	2.70	2.0	3/5/2013
797	Will County	MW-10	boron	2.70	2.0	5/22/2013
798	Will County	MW-10	boron	2.30	2.0	8/15/2013
799	Will County	MW-10	boron	3.80	2.0	10/28/2013
800	Will County	MW-10	boron	2.50	2.0	2/20/2014
801	Will County	MW-10	manganese	0.250	0.150	12/13/2010
802	Will County	MW-10	manganese	0.220	0.150	3/28/2011
803	Will County	MW-10	manganese	0.250	0.150	6/15/2011
804	Will County	MW-10	manganese	0.270	0.150	9/15/2011
805	Will County	MW-10	manganese	0.290	0.150	12/8/2011
806	Will County	MW-10	manganese	0.250	0.150	3/16/2012
807	Will County	MW-10	manganese	0.260	0.150	6/20/2012
808	Will County	MW-10	manganese	0.230	0.150	9/24/2012
809	Will County	MW-10	manganese	0.290	0.150	12/18/2012
810	Will County	MW-10	manganese	0.290	0.150	3/5/2013
811	Will County	MW-10	manganese	0.240	0.150	5/22/2013
812	Will County	MW-10	manganese	0.220	0.150	10/28/2013
813	Will County	MW-10	manganese	0.180	0.150	2/20/2014
814	Will County	MW-10	sulfate	420	400	9/15/2011
815	Will County	MW-2	antimony	0.0073	0.0060	9/15/2011
816	Will County	MW-2	antimony	0.0170	0.0060	12/9/2011
817	Will County	MW-2	boron	2.30	2.0	6/15/2011
818	Will County	MW-2	boron	2.30	2.0	9/15/2011
819	Will County	MW-2	boron	2.20	2.0	9/24/2012
820	Will County	MW-2	boron	2.20	2.0	8/14/2013
821	Will County	MW-2	boron	2.40	2.0	10/28/2013
822	Will County	MW-2	boron	2.40	2.0	2/20/2014
823	Will County	MW-2	chloride	250	200	3/28/2011
824	Will County	MW-2	sulfate	430	400	12/13/2010
825	Will County	MW-3	boron	2.70	2.0	12/13/2010
826	Will County	MW-3	boron	2.40	2.0	3/28/2011
827	Will County	MW-3	boron	2.60	2.0	6/15/2011
828	Will County	MW-3	boron	3.30	2.0	9/15/2011
829	Will County	MW-3	boron	2.80	2.0	12/8/2011

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830	Will County	MW-3	boron	2.70	2.0	3/16/2012
831	Will County	MW-3	boron	3.10	2.0	6/20/2012
832	Will County	MW-3	boron	3.90	2.0	9/24/2012
833	Will County	MW-3	boron	3.40	2.0	12/18/2012
834	Will County	MW-3	boron	3.20	2.0	3/5/2013
835	Will County	MW-3	boron	3.70	2.0	5/22/2013
836	Will County	MW-3	boron	3.60	2.0	8/14/2013
837	Will County	MW-3	boron	3.50	2.0	10/28/2013
838	Will County	MW-3	boron	3.20	2.0	2/13/2014
839	Will County	MW-3	chloride	250	200	3/28/2011
840	Will County	MW-3	manganese	0.340	0.150	12/13/2010
841	Will County	MW-3	manganese	0.310	0.150	3/28/2011
842	Will County	MW-3	manganese	0.340	0.150	6/15/2011
843	Will County	MW-3	manganese	0.260	0.150	9/15/2011
844	Will County	MW-3	manganese	0.290	0.150	12/8/2011
845	Will County	MW-3	manganese	0.270	0.150	3/16/2012
846	Will County	MW-3	manganese	0.370	0.150	6/20/2012
847	Will County	MW-3	manganese	0.240	0.150	9/24/2012
848	Will County	MW-3	manganese	0.250	0.150	12/18/2012
849	Will County	MW-3	manganese	0.290	0.150	3/5/2013
850	Will County	MW-3	manganese	0.220	0.150	5/22/2013
851	Will County	MW-3	manganese	0.190	0.150	8/14/2013
852	Will County	MW-3	manganese	0.160	0.150	10/28/2013
853	Will County	MW-3	manganese	0.450	0.150	2/13/2014
854	Will County	MW-3	sulfate	500	400	6/20/2012
855	Will County	MW-3	sulfate	440	400	9/24/2012
856	Will County	MW-3	sulfate	480	400	12/18/2012
857	Will County	MW-3	sulfate	610	400	5/22/2013
858	Will County	MW-3	sulfate	530	400	8/14/2013
859	Will County	MW-3	sulfate	540	400	10/28/2013
860	Will County	MW-3	sulfate	560	400	2/13/2014
861	Will County	MW-3	TDS	1,400	1,200	6/20/2012
862	Will County	MW-4	boron	3.70	2.0	12/13/2010
863	Will County	MW-4	boron	3.30	2.0	3/28/2011
864	Will County	MW-4	boron	3.60	2.0	6/15/2011
865	Will County	MW-4	boron	4.30	2.0	9/15/2011
866	Will County	MW-4	boron	3.00	2.0	12/8/2011
867	Will County	MW-4	boron	4.00	2.0	3/16/2012
868	Will County	MW-4	boron	5.30	2.0	6/20/2012
869	Will County	MW-4	boron	6.20	2.0	9/24/2012
870	Will County	MW-4	boron	5.20	2.0	12/18/2012
871	Will County	MW-4	boron	4.50	2.0	3/5/2013
872	Will County	MW-4	boron	3.80	2.0	5/22/2013
873	Will County	MW-4	boron	5.10	2.0	8/14/2013
874	Will County	MW-4	boron	5.60	2.0	10/28/2013
875	Will County	MW-4	boron	4.60	2.0	2/13/2014
876	Will County	MW-4	manganese	0.520	0.150	12/13/2010
877	Will County	MW-4	manganese	0.580	0.150	3/28/2011
878	Will County	MW-4	manganese	0.700	0.150	6/15/2011
879	Will County	MW-4	manganese	1.000	0.150	9/15/2011
880	Will County	MW-4	manganese	0.620	0.150	12/8/2011
881	Will County	MW-4	manganese	0.600	0.150	3/16/2012

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882	Will County	MW-4	manganese	0.700	0.150	6/20/2012
883	Will County	MW-4	manganese	0.990	0.150	9/24/2012
884	Will County	MW-4	manganese	0.620	0.150	12/18/2012
885	Will County	MW-4	manganese	0.470	0.150	3/5/2013
886	Will County	MW-4	manganese	0.440	0.150	5/22/2013
887	Will County	MW-4	manganese	0.580	0.150	8/14/2013
888	Will County	MW-4	manganese	0.650	0.150	10/28/2013
889	Will County	MW-4	manganese	0.720	0.150	2/13/2014
890	Will County	MW-4	sulfate	1,500	400	12/13/2010
891	Will County	MW-4	sulfate	1,500	400	3/28/2011
892	Will County	MW-4	sulfate	1,600	400	6/15/2011
893	Will County	MW-4	sulfate	4,800	400	9/15/2011
894	Will County	MW-4	sulfate	1,600	400	12/8/2011
895	Will County	MW-4	sulfate	2,000	400	3/16/2012
896	Will County	MW-4	sulfate	2,800	400	6/20/2012
897	Will County	MW-4	sulfate	3,200	400	9/24/2012
898	Will County	MW-4	sulfate	2,200	400	12/18/2012
899	Will County	MW-4	sulfate	2,000	400	3/5/2013
900	Will County	MW-4	sulfate	1,500	400	5/22/2013
901	Will County	MW-4	sulfate	2,200	400	8/14/2013
902	Will County	MW-4	sulfate	1,300	400	10/28/2013
903	Will County	MW-4	sulfate	1,400	400	2/13/2014
904	Will County	MW-4	TDS	2,500	1,200	12/13/2010
905	Will County	MW-4	TDS	2,600	1,200	3/28/2011
906	Will County	MW-4	TDS	2,800	1,200	6/15/2011
907	Will County	MW-4	TDS	6,000	1,200	9/15/2011
908	Will County	MW-4	TDS	3,100	1,200	12/8/2011
909	Will County	MW-4	TDS	3,700	1,200	3/16/2012
910	Will County	MW-4	TDS	4,300	1,200	6/20/2012
911	Will County	MW-4	TDS	4,400	1,200	9/24/2012
912	Will County	MW-4	TDS	4,000	1,200	12/18/2012
913	Will County	MW-4	TDS	3,600	1,200	3/5/2013
914	Will County	MW-4	TDS	2,900	1,200	5/22/2013
915	Will County	MW-4	TDS	3,500	1,200	8/14/2013
916	Will County	MW-4	TDS	2,400	1,200	10/28/2013
917	Will County	MW-4	TDS	2,800	1,200	2/13/2014
918	Will County	MW-5	boron	2.60	2.0	12/13/2010
919	Will County	MW-5	boron	2.70	2.0	3/28/2011
920	Will County	MW-5	boron	3.20	2.0	6/15/2011
921	Will County	MW-5	boron	4.00	2.0	9/15/2011
922	Will County	MW-5	boron	3.20	2.0	12/8/2011
923	Will County	MW-5	boron	2.90	2.0	3/16/2012
924	Will County	MW-5	boron	2.30	2.0	6/20/2012
925	Will County	MW-5	boron	3.80	2.0	9/24/2012
926	Will County	MW-5	boron	2.50	2.0	12/18/2012
927	Will County	MW-5	boron	2.60	2.0	3/5/2013
928	Will County	MW-5	boron	3.60	2.0	6/5/2013
929	Will County	MW-5	boron	3.50	2.0	8/14/2013
930	Will County	MW-5	boron	4.10	2.0	10/28/2013
931	Will County	MW-5	boron	2.70	2.0	2/13/2014
932	Will County	MW-5	selenium	0.170	0.050	10/28/2013
933	Will County	MW-5	sulfate	580	400	12/13/2010

Exhibit B: Violations of Illinois Class I groundwater standards at Midwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. Highlighted violations were not listed in the Violation Notices sent by Illinois EPA in June, 2012. This table does not include pH violations.

934	Will County	MW-5	sulfate	570	400	3/28/2011
935	Will County	MW-5	sulfate	540	400	6/15/2011
936	Will County	MW-5	sulfate	690	400	9/15/2011
937	Will County	MW-5	sulfate	500	400	12/8/2011
938	Will County	MW-5	sulfate	410	400	6/20/2012
939	Will County	MW-5	sulfate	540	400	9/24/2012
940	Will County	MW-5	sulfate	650	400	6/5/2013
941	Will County	MW-5	sulfate	500	400	8/14/2013
942	Will County	MW-5	sulfate	560	400	10/28/2013
943	Will County	MW-5	sulfate	690	400	2/13/2014
944	Will County	MW-5	TDS	1,300	1,200	3/28/2011
945	Will County	MW-5	TDS	1,400	1,200	6/15/2011
946	Will County	MW-5	TDS	1,500	1,200	9/15/2011
947	Will County	MW-5	TDS	1,600	1,200	6/5/2013
948	Will County	MW-5	TDS	1,300	1,200	10/28/2013
949	Will County	MW-5	TDS	1,400	1,200	2/13/2014
950	Will County	MW-6	boron	2.70	2.0	12/13/2010
951	Will County	MW-6	boron	2.50	2.0	3/28/2011
952	Will County	MW-6	boron	2.40	2.0	6/15/2011
953	Will County	MW-6	boron	3.00	2.0	9/15/2011
954	Will County	MW-6	boron	2.50	2.0	12/8/2011
955	Will County	MW-6	boron	2.50	2.0	3/16/2012
956	Will County	MW-6	boron	2.90	2.0	6/20/2012
957	Will County	MW-6	boron	3.00	2.0	9/24/2012
958	Will County	MW-6	boron	3.00	2.0	12/18/2012
959	Will County	MW-6	boron	2.70	2.0	3/5/2013
960	Will County	MW-6	boron	2.80	2.0	5/22/2013
961	Will County	MW-6	boron	2.90	2.0	8/14/2013
962	Will County	MW-6	boron	3.70	2.0	10/28/2013
963	Will County	MW-6	boron	3.00	2.0	2/13/2014
964	Will County	MW-6	chloride	210	200	3/28/2011
965	Will County	MW-6	sulfate	500	400	12/13/2010
966	Will County	MW-6	sulfate	540	400	3/28/2011
967	Will County	MW-6	sulfate	570	400	6/15/2011
968	Will County	MW-6	sulfate	420	400	9/15/2011
969	Will County	MW-6	sulfate	440	400	12/8/2011
970	Will County	MW-6	sulfate	450	400	6/20/2012
971	Will County	MW-6	sulfate	550	400	9/24/2012
972	Will County	MW-7	boron	4.70	2.0	12/13/2010
973	Will County	MW-7	boron	5.00	2.0	3/28/2011
974	Will County	MW-7	boron	5.70	2.0	6/15/2011
975	Will County	MW-7	boron	3.40	2.0	9/15/2011
976	Will County	MW-7	boron	5.00	2.0	12/8/2011
977	Will County	MW-7	boron	5.10	2.0	3/16/2012
978	Will County	MW-7	boron	5.60	2.0	6/20/2012
979	Will County	MW-7	boron	5.50	2.0	9/24/2012
980	Will County	MW-7	boron	5.10	2.0	12/18/2012
981	Will County	MW-7	boron	4.30	2.0	3/5/2013
982	Will County	MW-7	boron	2.60	2.0	5/22/2013
983	Will County	MW-7	boron	3.50	2.0	8/15/2013
984	Will County	MW-7	boron	3.00	2.0	10/29/2013
985	Will County	MW-7	boron	4.00	2.0	2/20/2014

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986	Will County	MW-7	chloride	210	200	2/20/2014
987	Will County	MW-7	manganese	0.180	0.150	9/15/2011
988	Will County	MW-7	manganese	0.200	0.150	12/8/2011
989	Will County	MW-7	manganese	0.200	0.150	3/16/2012
990	Will County	MW-7	manganese	0.190	0.150	6/20/2012
991	Will County	MW-7	manganese	0.190	0.150	9/24/2012
992	Will County	MW-7	manganese	0.190	0.150	12/18/2012
993	Will County	MW-7	manganese	0.160	0.150	2/20/2014
994	Will County	MW-7	sulfate	610	400	12/13/2010
995	Will County	MW-7	sulfate	650	400	3/28/2011
996	Will County	MW-7	sulfate	1,000	400	6/15/2011
997	Will County	MW-7	sulfate	710	400	9/15/2011
998	Will County	MW-7	sulfate	710	400	12/8/2011
999	Will County	MW-7	sulfate	770	400	3/16/2012
1000	Will County	MW-7	sulfate	670	400	6/20/2012
1001	Will County	MW-7	sulfate	600	400	9/24/2012
1002	Will County	MW-7	sulfate	480	400	12/18/2012
1003	Will County	MW-7	sulfate	460	400	8/15/2013
1004	Will County	MW-7	sulfate	530	400	10/29/2013
1005	Will County	MW-7	TDS	1,300	1,200	12/13/2010
1006	Will County	MW-7	TDS	1,500	1,200	3/28/2011
1007	Will County	MW-7	TDS	1,600	1,200	6/15/2011
1008	Will County	MW-7	TDS	1,400	1,200	9/15/2011
1009	Will County	MW-7	TDS	1,300	1,200	12/8/2011
1010	Will County	MW-7	TDS	1,400	1,200	3/16/2012
1011	Will County	MW-7	TDS	1,300	1,200	6/20/2012
1012	Will County	MW-7	TDS	1,300	1,200	2/20/2014
1013	Will County	MW-8	arsenic	0.0140	0.0100	9/15/2011
1014	Will County	MW-8	arsenic	0.0120	0.0100	12/8/2011
1015	Will County	MW-8	arsenic	0.0130	0.0100	6/20/2012
1016	Will County	MW-8	arsenic	0.0180	0.0100	9/24/2012
1017	Will County	MW-8	arsenic	0.0160	0.0100	8/15/2013
1018	Will County	MW-8	boron	2.30	2.0	9/15/2011
1019	Will County	MW-8	boron	2.60	2.0	9/24/2012
1020	Will County	MW-8	boron	2.10	2.0	12/18/2012
1021	Will County	MW-8	boron	2.40	2.0	8/15/2013
1022	Will County	MW-8	boron	3.20	2.0	10/28/2013
1023	Will County	MW-8	chloride	270	200	3/29/2011
1024	Will County	MW-8	manganese	0.330	0.150	12/13/2010
1025	Will County	MW-8	manganese	0.440	0.150	3/29/2011
1026	Will County	MW-8	manganese	0.470	0.150	6/15/2011
1027	Will County	MW-8	manganese	0.450	0.150	9/15/2011
1028	Will County	MW-8	manganese	0.400	0.150	12/8/2011
1029	Will County	MW-8	manganese	0.360	0.150	6/20/2012
1030	Will County	MW-8	manganese	0.410	0.150	9/24/2012
1031	Will County	MW-8	manganese	0.430	0.150	12/18/2012
1032	Will County	MW-8	manganese	0.330	0.150	3/5/2013
1033	Will County	MW-8	manganese	0.470	0.150	5/23/2013
1034	Will County	MW-8	manganese	0.310	0.150	8/15/2013
1035	Will County	MW-8	manganese	0.420	0.150	10/28/2013
1036	Will County	MW-8	manganese	0.390	0.150	2/20/2014
1037	Will County	MW-8	sulfate	440	400	12/13/2010

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1038	Will County	MW-8	sulfate	440	400	3/29/2011
1039	Will County	MW-8	sulfate	420	400	6/15/2011
1040	Will County	MW-8	sulfate	600	400	9/15/2011
1041	Will County	MW-8	sulfate	630	400	9/24/2012
1042	Will County	MW-8	sulfate	440	400	8/15/2013
1043	Will County	MW-8	sulfate	650	400	10/28/2013
1044	Will County	MW-8	TDS	1,300	1,200	9/15/2011
1045	Will County	MW-8	TDS	1,600	1,200	10/28/2013
1046	Will County	MW-8	TDS	1,300	1,200	2/20/2014
1047	Will County	MW-9	boron	2.20	2.0	12/13/2010
1048	Will County	MW-9	boron	2.20	2.0	10/29/2013
1049	Will County	MW-9	chloride	280	200	3/28/2011
1050	Will County	MW-9	chloride	230	200	6/15/2011
1051	Will County	MW-9	chloride	270	200	2/13/2014
1052	Will County	MW-9	sulfate	410	400	12/13/2010
1053	Will County	MW-9	sulfate	410	400	6/15/2011

EXHIBIT C: Violations of Illinois Class II Groundwater Quality Standards at Joliet 29, Powerton, Waukegan, and Will County Generating Stations.

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

violation number	Plant	Well	Pollutant	Sample value (mg/L)	Class II GW standard (mg/L)	Collection date
1	Joliet 29	MW-1	chloride	210	200	5/23/2013
2	Joliet 29	MW-10	chloride	300	200	3/28/2011
3	Joliet 29	MW-10	chloride	290	200	6/19/2012
4	Joliet 29	MW-10	chloride	230	200	9/19/2012
5	Joliet 29	MW-10	chloride	210	200	3/5/2013
6	Joliet 29	MW-10	chloride	240	200	5/22/2013
7	Joliet 29	MW-10	chloride	210	200	7/23/2013
8	Joliet 29	MW-10	chloride	220	200	10/15/2013
9	Joliet 29	MW-10	chloride	240	200	2/17/2014
10	Joliet 29	MW-10	chloride	300	200	5/1/2014
11	Joliet 29	MW-11	boron	2.6	2.0	3/28/2011
12	Joliet 29	MW-11	boron	2.2	2.0	6/14/2011
13	Joliet 29	MW-11	chloride	270	200	3/28/2011
14	Joliet 29	MW-11	chloride	280	200	6/14/2011
15	Joliet 29	MW-11	chloride	240	200	3/15/2012
16	Joliet 29	MW-11	chloride	430	200	2/21/2014
17	Joliet 29	MW-11	chloride	340	200	5/1/2014
18	Joliet 29	MW-2	chloride	230	200	6/14/2011
19	Joliet 29	MW-2	chloride	280	200	3/15/2012
20	Joliet 29	MW-2	chloride	260	200	3/5/2013
21	Joliet 29	MW-2	chloride	250	200	5/23/2013
22	Joliet 29	MW-2	chloride	310	200	7/22/2013
23	Joliet 29	MW-2	chloride	240	200	2/21/2014
24	Joliet 29	MW-2	chloride	350	200	5/2/2014
25	Joliet 29	MW-2	chloride	280	200	8/18/2014
26	Joliet 29	MW-3	chloride	260	200	12/7/2010
27	Joliet 29	MW-3	chloride	240	200	3/28/2011
28	Joliet 29	MW-3	chloride	300	200	6/14/2011
29	Joliet 29	MW-3	chloride	260	200	12/7/2011
30	Joliet 29	MW-3	chloride	250	200	3/15/2012
31	Joliet 29	MW-3	chloride	260	200	6/19/2012
32	Joliet 29	MW-3	chloride	330	200	9/19/2012
33	Joliet 29	MW-3	chloride	290	200	12/20/2012
34	Joliet 29	MW-3	chloride	260	200	3/5/2013
35	Joliet 29	MW-3	chloride	380	200	5/22/2013
36	Joliet 29	MW-3	chloride	210	200	7/22/2013
37	Joliet 29	MW-3	chloride	250	200	10/15/2013
38	Joliet 29	MW-3	chloride	200	200	2/17/2014
39	Joliet 29	MW-3	chloride	300	200	5/2/2014
40	Joliet 29	MW-3	chloride	220	200	8/18/2014
41	Joliet 29	MW-3	TDS	1,300	1,200	5/22/2013
42	Joliet 29	MW-4	chloride	270	200	12/6/2010
43	Joliet 29	MW-4	chloride	270	200	3/28/2011
44	Joliet 29	MW-4	chloride	250	200	6/14/2011
45	Joliet 29	MW-4	chloride	210	200	3/15/2012
46	Joliet 29	MW-4	chloride	270	200	6/19/2012
47	Joliet 29	MW-4	chloride	260	200	9/19/2012
48	Joliet 29	MW-4	chloride	250	200	12/20/2012
49	Joliet 29	MW-4	chloride	230	200	3/5/2013
50	Joliet 29	MW-4	chloride	270	200	5/22/2013

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51	Joliet 29	MW-4	chloride	210	200	10/16/2013
52	Joliet 29	MW-4	chloride	220	200	2/21/2014
53	Joliet 29	MW-4	chloride	270	200	5/1/2014
54	Joliet 29	MW-4	chloride	210	200	8/18/2014
55	Joliet 29	MW-5	chloride	240	200	3/28/2011
56	Joliet 29	MW-5	chloride	220	200	6/14/2011
57	Joliet 29	MW-5	chloride	210	200	3/15/2012
58	Joliet 29	MW-5	chloride	220	200	6/19/2012
59	Joliet 29	MW-5	chloride	240	200	9/19/2012
60	Joliet 29	MW-5	chloride	210	200	12/20/2012
61	Joliet 29	MW-5	chloride	230	200	3/5/2013
62	Joliet 29	MW-5	chloride	240	200	2/21/2014
63	Joliet 29	MW-5	chloride	370	200	5/1/2014
64	Joliet 29	MW-6	chloride	270	200	3/28/2011
65	Joliet 29	MW-6	chloride	240	200	3/15/2012
66	Joliet 29	MW-6	chloride	210	200	6/19/2012
67	Joliet 29	MW-6	chloride	370	200	2/21/2014
68	Joliet 29	MW-6	chloride	340	200	5/2/2014
69	Joliet 29	MW-7	chloride	430	200	12/6/2010
70	Joliet 29	MW-7	chloride	320	200	3/28/2011
71	Joliet 29	MW-7	chloride	300	200	3/15/2012
72	Joliet 29	MW-7	chloride	470	200	2/21/2014
73	Joliet 29	MW-7	chloride	350	200	5/2/2014
74	Joliet 29	MW-8	chloride	350	200	3/28/2011
75	Joliet 29	MW-8	chloride	410	200	3/15/2012
76	Joliet 29	MW-8	chloride	300	200	5/23/2013
77	Joliet 29	MW-8	chloride	210	200	7/22/2013
78	Joliet 29	MW-8	chloride	270	200	2/21/2014
79	Joliet 29	MW-8	chloride	780	200	5/1/2014
80	Joliet 29	MW-8	sulfate	460	400	5/1/2014
81	Joliet 29	MW-8	TDS	2,100	1,200	5/1/2014
82	Joliet 29	MW-9	chloride	230	200	3/28/2011
83	Joliet 29	MW-9	chloride	290	200	6/14/2011
84	Joliet 29	MW-9	chloride	250	200	6/19/2012
85	Joliet 29	MW-9	chloride	290	200	5/23/2013
86	Joliet 29	MW-9	chloride	280	200	7/22/2013
87	Joliet 29	MW-9	chloride	280	200	10/15/2013
88	Joliet 29	MW-9	chloride	270	200	2/17/2014
89	Joliet 29	MW-9	chloride	340	200	5/1/2014
90	Joliet 29	MW-9	chloride	270	200	8/18/2014
91	Joliet 29	MW-9	iron	7.3	5.0	6/14/2011
92	Joliet 29	MW-9	iron	5.5	5.0	3/15/2012
93	Joliet 29	MW-9	iron	8.0	5.0	6/19/2012
94	Joliet 29	MW-9	iron	13.0	5.0	12/20/2012
95	Joliet 29	MW-9	iron	15.0	5.0	3/5/2013
96	Joliet 29	MW-9	iron	160.0	5.0	5/23/2013
97	Joliet 29	MW-9	iron	50.0	5.0	7/22/2013
98	Joliet 29	MW-9	iron	25.0	5.0	10/15/2013
99	Joliet 29	MW-9	iron	12.0	5.0	2/17/2014
100	Joliet 29	MW-9	iron	8.4	5.0	5/1/2014
101	Joliet 29	MW-9	iron	130.0	5.0	8/18/2014
102	Joliet 29	MW-9	sulfate	1,600	400	12/6/2010
103	Joliet 29	MW-9	sulfate	1,100	400	3/28/2011

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104	Joliet 29	MW-9	sulfate	580	400	6/14/2011
105	Joliet 29	MW-9	sulfate	750	400	9/14/2011
106	Joliet 29	MW-9	sulfate	1,600	400	3/15/2012
107	Joliet 29	MW-9	sulfate	1,500	400	6/19/2012
108	Joliet 29	MW-9	sulfate	1,600	400	9/19/2012
109	Joliet 29	MW-9	sulfate	1,100	400	12/20/2012
110	Joliet 29	MW-9	sulfate	700	400	3/5/2013
111	Joliet 29	MW-9	sulfate	1,300	400	5/23/2013
112	Joliet 29	MW-9	sulfate	1,000	400	7/22/2013
113	Joliet 29	MW-9	sulfate	680	400	10/15/2013
114	Joliet 29	MW-9	sulfate	560	400	2/17/2014
115	Joliet 29	MW-9	sulfate	560	400	5/1/2014
116	Joliet 29	MW-9	sulfate	880	400	8/18/2014
117	Joliet 29	MW-9	TDS	2,600	1,200	12/6/2010
118	Joliet 29	MW-9	TDS	2,400	1,200	3/28/2011
119	Joliet 29	MW-9	TDS	1,500	1,200	6/14/2011
120	Joliet 29	MW-9	TDS	1,700	1,200	9/14/2011
121	Joliet 29	MW-9	TDS	2,400	1,200	12/7/2011
122	Joliet 29	MW-9	TDS	2,600	1,200	3/15/2012
123	Joliet 29	MW-9	TDS	2,800	1,200	6/19/2012
124	Joliet 29	MW-9	TDS	2,900	1,200	9/19/2012
125	Joliet 29	MW-9	TDS	2,000	1,200	12/20/2012
126	Joliet 29	MW-9	TDS	1,700	1,200	3/5/2013
127	Joliet 29	MW-9	TDS	3,000	1,200	5/23/2013
128	Joliet 29	MW-9	TDS	2,300	1,200	7/22/2013
129	Joliet 29	MW-9	TDS	1,700	1,200	10/15/2013
130	Joliet 29	MW-9	TDS	1,600	1,200	2/17/2014
131	Joliet 29	MW-9	TDS	1,700	1,200	5/1/2014
132	Joliet 29	MW-9	TDS	2,100	1,200	8/18/2014
133	Powerton	MW-10	boron	2.10	2.0	3/6/2014
134	Powerton	MW-10	boron	3.20	2.0	5/30/2014
135	Powerton	MW-11	boron	2.30	2.0	3/19/2012
136	Powerton	MW-11	boron	2.60	2.0	9/18/2012
137	Powerton	MW-11	iron	5.80	5.0	3/4/2014
138	Powerton	MW-11	iron	5.50	5.0	8/26/2014
139	Powerton	MW-11	manganese	12.000	10.000	12/12/2012
140	Powerton	MW-11	manganese	11.000	10.000	2/27/2013
141	Powerton	MW-12	boron	3.70	2.0	5/30/2013
142	Powerton	MW-12	chloride	210	200	12/12/2011
143	Powerton	MW-12	chloride	210	200	12/12/2012
144	Powerton	MW-12	chloride	220	200	3/4/2014
145	Powerton	MW-12	chloride	220	200	5/29/2014
146	Powerton	MW-12	chloride	210	200	8/26/2014
147	Powerton	MW-12	iron	5.50	5.0	12/16/2010
148	Powerton	MW-12	iron	6.30	5.0	2/15/2011
149	Powerton	MW-12	iron	5.60	5.0	6/16/2011
150	Powerton	MW-12	iron	8.20	5.0	6/25/2012
151	Powerton	MW-12	iron	8.90	5.0	9/18/2012
152	Powerton	MW-12	iron	6.40	5.0	12/12/2012
153	Powerton	MW-12	iron	5.80	5.0	2/27/2013
154	Powerton	MW-12	iron	8.90	5.0	5/30/2013
155	Powerton	MW-12	sulfate	430	400	6/25/2012
156	Powerton	MW-12	sulfate	410	400	5/30/2013

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

157	Powerton	MW-12	sulfate	420	400	7/29/2013
158	Powerton	MW-12	sulfate	530	400	3/4/2014
159	Powerton	MW-12	sulfate	560	400	5/29/2014
160	Powerton	MW-12	TDS	1,400	1,200	3/4/2014
161	Powerton	MW-12	TDS	1,300	1,200	5/29/2014
162	Powerton	MW-13	boron	3.90	2.0	12/15/2010
163	Powerton	MW-13	boron	3.10	2.0	2/15/2011
164	Powerton	MW-13	boron	2.60	2.0	4/25/2011
165	Powerton	MW-13	boron	3.00	2.0	6/16/2011
166	Powerton	MW-13	boron	2.70	2.0	8/9/2011
167	Powerton	MW-13	boron	3.00	2.0	10/13/2011
168	Powerton	MW-13	boron	4.10	2.0	12/12/2011
169	Powerton	MW-13	boron	4.00	2.0	4/10/2012
170	Powerton	MW-13	boron	3.60	2.0	12/14/2012
171	Powerton	MW-13	boron	4.20	2.0	2/28/2013
172	Powerton	MW-13	boron	3.80	2.0	7/30/2013
173	Powerton	MW-13	boron	3.50	2.0	10/22/2013
174	Powerton	MW-13	boron	2.90	2.0	3/4/2014
175	Powerton	MW-13	boron	3.50	2.0	5/28/2014
176	Powerton	MW-13	boron	3.00	2.0	8/27/2014
177	Powerton	MW-13	chloride	210	200	12/14/2012
178	Powerton	MW-13	sulfate	1,400	400	12/15/2010
179	Powerton	MW-13	sulfate	770	400	2/15/2011
180	Powerton	MW-13	sulfate	580	400	4/25/2011
181	Powerton	MW-13	sulfate	540	400	6/16/2011
182	Powerton	MW-13	sulfate	440	400	8/9/2011
183	Powerton	MW-13	sulfate	660	400	10/13/2011
184	Powerton	MW-13	sulfate	1,100	400	12/12/2011
185	Powerton	MW-13	sulfate	1,100	400	4/10/2012
186	Powerton	MW-13	sulfate	1,100	400	12/14/2012
187	Powerton	MW-13	sulfate	730	400	2/28/2013
188	Powerton	MW-13	sulfate	880	400	5/30/2013
189	Powerton	MW-13	sulfate	1,000	400	7/30/2013
190	Powerton	MW-13	sulfate	690	400	10/22/2013
191	Powerton	MW-13	sulfate	660	400	3/4/2014
192	Powerton	MW-13	sulfate	630	400	5/28/2014
193	Powerton	MW-13	sulfate	740	400	8/27/2014
194	Powerton	MW-13	TDS	2,600	1,200	12/15/2010
195	Powerton	MW-13	TDS	1,600	1,200	2/15/2011
196	Powerton	MW-13	TDS	1,400	1,200	4/25/2011
197	Powerton	MW-13	TDS	1,300	1,200	6/16/2011
198	Powerton	MW-13	TDS	1,500	1,200	10/13/2011
199	Powerton	MW-13	TDS	2,100	1,200	12/12/2011
200	Powerton	MW-13	TDS	2,300	1,200	4/10/2012
201	Powerton	MW-13	TDS	1,900	1,200	12/14/2012
202	Powerton	MW-13	TDS	1,600	1,200	2/28/2013
203	Powerton	MW-13	TDS	2,000	1,200	5/30/2013
204	Powerton	MW-13	TDS	2,000	1,200	7/30/2013
205	Powerton	MW-13	TDS	1,700	1,200	10/22/2013
206	Powerton	MW-13	TDS	1,900	1,200	3/4/2014
207	Powerton	MW-13	TDS	2,100	1,200	5/28/2014
208	Powerton	MW-13	TDS	2,300	1,200	8/27/2014
209	Powerton	MW-14	chloride	240	200	8/9/2011

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

210	Powerton	MW-14	chloride	220	200	3/4/2014
211	Powerton	MW-14	iron	12.00	5.0	12/14/2012
212	Powerton	MW-14	selenium	0.065	0.050	4/25/2011
213	Powerton	MW-14	selenium	0.150	0.050	2/27/2013
214	Powerton	MW-14	sulfate	960	400	12/15/2010
215	Powerton	MW-14	sulfate	820	400	2/15/2011
216	Powerton	MW-14	sulfate	770	400	4/25/2011
217	Powerton	MW-14	sulfate	810	400	6/16/2011
218	Powerton	MW-14	sulfate	940	400	8/9/2011
219	Powerton	MW-14	sulfate	850	400	10/13/2011
220	Powerton	MW-14	sulfate	880	400	12/12/2011
221	Powerton	MW-14	sulfate	990	400	4/10/2012
222	Powerton	MW-14	sulfate	810	400	12/14/2012
223	Powerton	MW-14	sulfate	800	400	5/30/2013
224	Powerton	MW-14	sulfate	900	400	7/30/2013
225	Powerton	MW-14	sulfate	840	400	10/23/2013
226	Powerton	MW-14	sulfate	680	400	3/4/2014
227	Powerton	MW-14	sulfate	720	400	5/28/2014
228	Powerton	MW-14	sulfate	1,100	400	8/28/2014
229	Powerton	MW-14	TDS	1,800	1,200	12/15/2010
230	Powerton	MW-14	TDS	1,700	1,200	2/15/2011
231	Powerton	MW-14	TDS	1,800	1,200	4/25/2011
232	Powerton	MW-14	TDS	1,900	1,200	6/16/2011
233	Powerton	MW-14	TDS	2,000	1,200	8/9/2011
234	Powerton	MW-14	TDS	1,800	1,200	10/13/2011
235	Powerton	MW-14	TDS	1,800	1,200	12/12/2011
236	Powerton	MW-14	TDS	2,200	1,200	4/10/2012
237	Powerton	MW-14	TDS	1,700	1,200	12/14/2012
238	Powerton	MW-14	TDS	1,300	1,200	2/27/2013
239	Powerton	MW-14	TDS	2,000	1,200	5/30/2013
240	Powerton	MW-14	TDS	2,100	1,200	7/30/2013
241	Powerton	MW-14	TDS	2,100	1,200	10/23/2013
242	Powerton	MW-14	TDS	1,900	1,200	3/4/2014
243	Powerton	MW-14	TDS	1,700	1,200	5/28/2014
244	Powerton	MW-14	TDS	2,400	1,200	8/28/2014
245	Powerton	MW-15	chloride	210	200	8/9/2011
246	Powerton	MW-15	chloride	220	200	12/14/2012
247	Powerton	MW-15	chloride	210	200	5/30/2013
248	Powerton	MW-15	chloride	220	200	7/30/2013
249	Powerton	MW-15	chloride	210	200	10/23/2013
250	Powerton	MW-15	chloride	240	200	3/6/2014
251	Powerton	MW-15	chloride	220	200	5/28/2014
252	Powerton	MW-15	chloride	240	200	8/27/2014
253	Powerton	MW-15	sulfate	650	400	6/16/2011
254	Powerton	MW-15	sulfate	570	400	5/30/2013
255	Powerton	MW-15	sulfate	460	400	7/30/2013
256	Powerton	MW-15	sulfate	420	400	10/23/2013
257	Powerton	MW-15	sulfate	620	400	8/27/2014
258	Powerton	MW-15	TDS	1,600	1,200	6/16/2011
259	Powerton	MW-15	TDS	1,700	1,200	5/30/2013
260	Powerton	MW-15	TDS	1,400	1,200	7/30/2013
261	Powerton	MW-15	TDS	1,400	1,200	10/23/2013
262	Powerton	MW-15	TDS	1,300	1,200	3/6/2014

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263	Powerton	MW-15	TDS	1,300	1,200	5/28/2014
264	Powerton	MW-15	TDS	1,800	1,200	8/27/2014
265	Powerton	MW-16	chloride	230	200	3/3/2014
266	Powerton	MW-2	boron	2.70	2.0	10/21/2013
267	Powerton	MW-6	chloride	210	200	9/20/2011
268	Powerton	MW-6	chloride	240	200	12/12/2012
269	Powerton	MW-6	chloride	210	200	10/23/2013
270	Powerton	MW-6	chloride	230	200	3/6/2014
271	Powerton	MW-6	chloride	230	200	5/29/2014
272	Powerton	MW-6	chloride	230	200	8/27/2014
273	Powerton	MW-6	iron	22.00	5.0	5/29/2014
274	Powerton	MW-6	sulfate	450	400	6/25/2012
275	Powerton	MW-6	sulfate	440	400	12/12/2012
276	Powerton	MW-6	sulfate	560	400	5/29/2013
277	Powerton	MW-6	sulfate	440	400	7/31/2013
278	Powerton	MW-6	sulfate	410	400	3/6/2014
279	Powerton	MW-6	sulfate	530	400	5/29/2014
280	Powerton	MW-6	TDS	1,300	1,200	6/25/2012
281	Powerton	MW-6	TDS	1,400	1,200	5/29/2013
282	Powerton	MW-6	TDS	1,400	1,200	5/29/2014
283	Powerton	MW-6	TDS	1,300	1,200	8/27/2014
284	Powerton	MW-7	arsenic	0.2300	0.2000	12/12/2011
285	Powerton	MW-7	arsenic	0.2300	0.2000	3/19/2012
286	Powerton	MW-7	arsenic	0.2600	0.2000	12/12/2012
287	Powerton	MW-7	arsenic	0.2200	0.2000	7/31/2013
288	Powerton	MW-7	iron	8.00	5.0	12/6/2010
289	Powerton	MW-7	iron	7.50	5.0	3/25/2011
290	Powerton	MW-7	iron	10.00	5.0	6/16/2011
291	Powerton	MW-7	iron	22.00	5.0	9/20/2011
292	Powerton	MW-7	iron	26.00	5.0	12/12/2011
293	Powerton	MW-7	iron	31.00	5.0	3/19/2012
294	Powerton	MW-7	iron	10.00	5.0	6/25/2012
295	Powerton	MW-7	iron	21.00	5.0	9/18/2012
296	Powerton	MW-7	iron	18.00	5.0	12/12/2012
297	Powerton	MW-7	iron	27.00	5.0	2/27/2013
298	Powerton	MW-7	iron	15.00	5.0	5/31/2013
299	Powerton	MW-7	iron	30.00	5.0	7/31/2013
300	Powerton	MW-7	iron	20.00	5.0	10/23/2013
301	Powerton	MW-7	iron	17.00	5.0	3/5/2014
302	Powerton	MW-7	iron	14.00	5.0	8/27/2014
303	Powerton	MW-7	manganese	12.000	10.000	9/20/2011
304	Powerton	MW-7	manganese	12.000	10.000	12/12/2011
305	Powerton	MW-7	manganese	11.000	10.000	3/19/2012
306	Powerton	MW-7	manganese	11.000	10.000	7/31/2013
307	Powerton	MW-7	sulfate	530	400	5/29/2014
308	Powerton	MW-7	TDS	1,300	1,200	6/16/2011
309	Powerton	MW-7	TDS	1,300	1,200	9/20/2011
310	Powerton	MW-7	TDS	1,300	1,200	12/12/2011
311	Powerton	MW-7	TDS	1,400	1,200	3/19/2012
312	Powerton	MW-7	TDS	1,300	1,200	6/25/2012
313	Powerton	MW-7	TDS	1,300	1,200	9/18/2012
314	Powerton	MW-7	TDS	1,300	1,200	7/31/2013
315	Powerton	MW-7	TDS	1,400	1,200	5/29/2014

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

316	Powerton	MW-7	TDS	1,300	1,200	8/27/2014
317	Powerton	MW-8	chloride	210	200	3/25/2011
318	Powerton	MW-8	chloride	210	200	9/20/2011
319	Powerton	MW-8	chloride	210	200	9/18/2012
320	Powerton	MW-8	chloride	220	200	12/12/2012
321	Powerton	MW-8	chloride	230	200	5/30/2013
322	Powerton	MW-8	chloride	220	200	7/31/2013
323	Powerton	MW-8	chloride	260	200	10/23/2013
324	Powerton	MW-8	chloride	230	200	3/3/2014
325	Powerton	MW-8	chloride	340	200	5/28/2014
326	Powerton	MW-8	chloride	380	200	8/27/2014
327	Powerton	MW-8	iron	6.50	5.0	2/27/2013
328	Powerton	MW-8	iron	6.60	5.0	7/31/2013
329	Powerton	MW-8	sulfate	440	400	6/25/2012
330	Powerton	MW-8	sulfate	460	400	5/30/2013
331	Powerton	MW-8	TDS	1,300	1,200	5/30/2013
332	Powerton	MW-8	TDS	1,300	1,200	7/31/2013
333	Powerton	MW-8	TDS	1,300	1,200	10/23/2013
334	Powerton	MW-8	TDS	1,400	1,200	5/28/2014
335	Powerton	MW-8	TDS	1,400	1,200	8/27/2014
336	Powerton	MW-9	boron	2.10	2.0	12/16/2010
337	Powerton	MW-9	boron	2.50	2.0	9/20/2011
338	Powerton	MW-9	boron	2.70	2.0	12/12/2011
339	Powerton	MW-9	boron	2.60	2.0	3/19/2012
340	Powerton	MW-9	boron	2.60	2.0	6/25/2012
341	Powerton	MW-9	boron	2.90	2.0	9/18/2012
342	Powerton	MW-9	boron	3.20	2.0	12/12/2012
343	Powerton	MW-9	boron	4.30	2.0	2/27/2013
344	Powerton	MW-9	boron	3.20	2.0	5/30/2013
345	Powerton	MW-9	boron	2.50	2.0	7/30/2013
346	Powerton	MW-9	boron	2.50	2.0	5/29/2014
347	Powerton	MW-9	boron	2.40	2.0	8/26/2014
348	Powerton	MW-9	iron	24.00	5.0	2/27/2013
349	Waukegan	MW-1	boron	2.60	2.0	10/25/2010
350	Waukegan	MW-1	boron	2.60	2.0	6/13/2011
351	Waukegan	MW-1	boron	2.50	2.0	9/13/2011
352	Waukegan	MW-1	boron	2.80	2.0	12/6/2011
353	Waukegan	MW-1	boron	2.50	2.0	3/14/2012
354	Waukegan	MW-1	boron	2.20	2.0	3/7/2013
355	Waukegan	MW-1	boron	2.20	2.0	6/7/13
356	Waukegan	MW-1	boron	2.30	2.0	7/25/2013
357	Waukegan	MW-1	boron	3.10	2.0	11/4/2013
358	Waukegan	MW-1	selenium	0.056	0.050	3/7/2013
359	Waukegan	MW-2	boron	2.20	2.0	10/25/2010
360	Waukegan	MW-2	boron	2.20	2.0	3/24/2011
361	Waukegan	MW-2	boron	2.60	2.0	6/18/2012
362	Waukegan	MW-2	boron	2.10	2.0	9/28/2012
363	Waukegan	MW-2	boron	2.20	2.0	3/7/2013
364	Waukegan	MW-2	boron	2.10	2.0	7/25/2013
365	Waukegan	MW-2	boron	2.20	2.0	11/4/2013
366	Waukegan	MW-3	boron	2.20	2.0	3/24/2011
367	Waukegan	MW-3	boron	2.30	2.0	6/13/2011
368	Waukegan	MW-3	boron	2.50	2.0	6/7/2013

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

369	Waukegan	MW-3	selenium	0.067	0.050	6/7/2013
370	Waukegan	MW-4	boron	2.10	2.0	3/24/2011
371	Waukegan	MW-4	boron	2.10	2.0	12/6/2011
372	Waukegan	MW-4	boron	2.20	2.0	3/14/2012
373	Waukegan	MW-4	boron	2.50	2.0	6/18/2012
374	Waukegan	MW-4	boron	2.20	2.0	9/28/2012
375	Waukegan	MW-4	boron	2.50	2.0	12/19/2012
376	Waukegan	MW-4	boron	2.40	2.0	3/7/2013
377	Waukegan	MW-4	boron	2.30	2.0	6/6/2013
378	Waukegan	MW-4	boron	2.50	2.0	7/25/2013
379	Waukegan	MW-4	boron	2.80	2.0	11/4/2013
380	Waukegan	MW-5	boron	28.00	2.0	10/25/2010
381	Waukegan	MW-5	boron	33.00	2.0	3/24/2011
382	Waukegan	MW-5	boron	12.00	2.0	6/13/2011
383	Waukegan	MW-5	boron	30.00	2.0	9/13/2011
384	Waukegan	MW-5	boron	37.00	2.0	12/6/2011
385	Waukegan	MW-5	boron	44.00	2.0	3/14/2012
386	Waukegan	MW-5	boron	47.00	2.0	6/18/2012
387	Waukegan	MW-5	boron	41.00	2.0	9/28/2012
388	Waukegan	MW-5	boron	27.00	2.0	12/19/2012
389	Waukegan	MW-5	boron	33.00	2.0	3/7/2013
390	Waukegan	MW-5	boron	12.00	2.0	6/6/2013
391	Waukegan	MW-5	boron	29.00	2.0	7/25/2013
392	Waukegan	MW-5	boron	32.00	2.0	11/5/2013
393	Waukegan	MW-5	chloride	540	200	6/13/2011
394	Waukegan	MW-5	chloride	220	200	9/13/2011
395	Waukegan	MW-5	chloride	220	200	12/19/2012
396	Waukegan	MW-5	chloride	600	200	6/6/2013
397	Waukegan	MW-5	chloride	210	200	7/25/2013
398	Waukegan	MW-5	iron	5.60	5.0	12/6/2011
399	Waukegan	MW-5	iron	6.60	5.0	3/14/2012
400	Waukegan	MW-5	iron	5.90	5.0	6/18/2012
401	Waukegan	MW-5	iron	5.10	5.0	9/28/2012
402	Waukegan	MW-5	sulfate	920	400	10/25/2010
403	Waukegan	MW-5	sulfate	780	400	3/24/2011
404	Waukegan	MW-5	sulfate	1,100	400	6/13/2011
405	Waukegan	MW-5	sulfate	810	400	9/13/2011
406	Waukegan	MW-5	sulfate	1,100	400	12/6/2011
407	Waukegan	MW-5	sulfate	980	400	3/14/2012
408	Waukegan	MW-5	sulfate	800	400	6/18/2012
409	Waukegan	MW-5	sulfate	710	400	9/28/2012
410	Waukegan	MW-5	sulfate	550	400	12/19/2012
411	Waukegan	MW-5	sulfate	650	400	3/7/2013
412	Waukegan	MW-5	sulfate	1,200	400	6/6/2013
413	Waukegan	MW-5	sulfate	890	400	7/25/2013
414	Waukegan	MW-5	sulfate	870	400	11/5/2013
415	Waukegan	MW-5	TDS	1,500	1,200	10/25/2010
416	Waukegan	MW-5	TDS	1,800	1,200	3/24/2011
417	Waukegan	MW-5	TDS	3,300	1,200	6/13/2011
418	Waukegan	MW-5	TDS	2,300	1,200	9/13/2011
419	Waukegan	MW-5	TDS	2,300	1,200	12/6/2011
420	Waukegan	MW-5	TDS	2,000	1,200	3/14/2012
421	Waukegan	MW-5	TDS	2,000	1,200	6/18/2012

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422	Waukegan	MW-5	TDS	1,900	1,200	9/28/2012
423	Waukegan	MW-5	TDS	1,800	1,200	12/19/2012
424	Waukegan	MW-5	TDS	1,600	1,200	3/7/2013
425	Waukegan	MW-5	TDS	3,500	1,200	6/6/2013
426	Waukegan	MW-5	TDS	2,000	1,200	7/25/2013
427	Waukegan	MW-5	TDS	1,600	1,200	11/5/2013
428	Waukegan	MW-6	boron	2.80	2.0	3/7/2013
429	Waukegan	MW-6	boron	6.70	2.0	6/6/2013
430	Waukegan	MW-6	boron	4.30	2.0	7/25/2013
431	Waukegan	MW-6	boron	2.40	2.0	11/5/2013
432	Waukegan	MW-6	iron	6.20	5.0	6/6/2013
433	Waukegan	MW-6	iron	16.00	5.0	7/25/2013
434	Waukegan	MW-7	boron	43.00	2.0	12/19/2012
435	Waukegan	MW-7	boron	49.00	2.0	3/7/2013
436	Waukegan	MW-7	boron	42.00	2.0	6/6/2013
437	Waukegan	MW-7	boron	44.00	2.0	7/25/2013
438	Waukegan	MW-7	boron	45.00	2.0	11/4/2013
439	Waukegan	MW-7	iron	12.00	5.0	12/19/2012
440	Waukegan	MW-7	iron	12.00	5.0	3/7/2013
441	Waukegan	MW-7	iron	13.00	5.0	6/6/2013
442	Waukegan	MW-7	iron	13.00	5.0	7/25/2013
443	Waukegan	MW-7	iron	13.00	5.0	11/4/2013
444	Waukegan	MW-7	sulfate	630	400	12/19/2012
445	Waukegan	MW-7	sulfate	710	400	3/7/2013
446	Waukegan	MW-7	sulfate	650	400	6/6/2013
447	Waukegan	MW-7	sulfate	860	400	7/25/2013
448	Waukegan	MW-7	sulfate	770	400	11/4/2013
449	Waukegan	MW-7	TDS	1,800	1,200	12/19/2012
450	Waukegan	MW-7	TDS	1,800	1,200	3/7/2013
451	Waukegan	MW-7	TDS	1,800	1,200	6/6/2013
452	Waukegan	MW-7	TDS	1,800	1,200	7/25/2013
453	Waukegan	MW-7	TDS	1,800	1,200	11/4/2013
454	Will County	MW-1	boron	2.10	2.0	6/20/2012
455	Will County	MW-1	boron	2.40	2.0	5/23/2013
456	Will County	MW-1	boron	2.30	2.0	8/14/2013
457	Will County	MW-1	boron	2.60	2.0	10/29/2013
458	Will County	MW-1	boron	2.40	2.0	2/20/2014
459	Will County	MW-1	boron	2.50	2.0	5/20/2014
460	Will County	MW-1	chloride	210	200	3/28/2011
461	Will County	MW-1	chloride	220	200	3/5/2013
462	Will County	MW-1	sulfate	530	400	12/13/2010
463	Will County	MW-1	sulfate	430	400	3/16/2012
464	Will County	MW-1	sulfate	460	400	5/23/2013
465	Will County	MW-1	sulfate	540	400	8/14/2013
466	Will County	MW-1	sulfate	430	400	10/29/2013
467	Will County	MW-1	TDS	1,300	1,200	8/14/2013
468	Will County	MW-1	TDS	1,300	1,200	10/29/2013
469	Will County	MW-1	TDS	1,300	1,200	2/20/2014
470	Will County	MW-10	boron	2.10	2.0	12/13/2010
471	Will County	MW-10	boron	2.20	2.0	6/15/2011
472	Will County	MW-10	boron	2.80	2.0	9/15/2011
473	Will County	MW-10	boron	2.50	2.0	12/8/2011
474	Will County	MW-10	boron	2.10	2.0	3/16/2012

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

475	Will County	MW-10	boron	2.10	2.0	6/20/2012
476	Will County	MW-10	boron	3.20	2.0	9/24/2012
477	Will County	MW-10	boron	2.70	2.0	12/18/2012
478	Will County	MW-10	boron	2.70	2.0	3/5/2013
479	Will County	MW-10	boron	2.70	2.0	5/22/2013
480	Will County	MW-10	boron	2.30	2.0	8/15/2013
481	Will County	MW-10	boron	3.80	2.0	10/28/2013
482	Will County	MW-10	boron	2.50	2.0	2/20/2014
483	Will County	MW-10	sulfate	420	400	9/15/2011
484	Will County	MW-2	boron	2.30	2.0	6/15/2011
485	Will County	MW-2	boron	2.30	2.0	9/15/2011
486	Will County	MW-2	boron	2.20	2.0	9/24/2012
487	Will County	MW-2	boron	2.20	2.0	8/14/2013
488	Will County	MW-2	boron	2.40	2.0	10/28/2013
489	Will County	MW-2	boron	2.40	2.0	2/20/2014
490	Will County	MW-2	chloride	250	200	3/28/2011
491	Will County	MW-2	sulfate	430	400	12/13/2010
492	Will County	MW-3	boron	2.70	2.0	12/13/2010
493	Will County	MW-3	boron	2.40	2.0	3/28/2011
494	Will County	MW-3	boron	2.60	2.0	6/15/2011
495	Will County	MW-3	boron	3.30	2.0	9/15/2011
496	Will County	MW-3	boron	2.80	2.0	12/8/2011
497	Will County	MW-3	boron	2.70	2.0	3/16/2012
498	Will County	MW-3	boron	3.10	2.0	6/20/2012
499	Will County	MW-3	boron	3.90	2.0	9/24/2012
500	Will County	MW-3	boron	3.40	2.0	12/18/2012
501	Will County	MW-3	boron	3.20	2.0	3/5/2013
502	Will County	MW-3	boron	3.70	2.0	5/22/2013
503	Will County	MW-3	boron	3.60	2.0	8/14/2013
504	Will County	MW-3	boron	3.50	2.0	10/28/2013
505	Will County	MW-3	boron	3.20	2.0	2/13/2014
506	Will County	MW-3	chloride	250	200	3/28/2011
507	Will County	MW-3	sulfate	500	400	6/20/2012
508	Will County	MW-3	sulfate	440	400	9/24/2012
509	Will County	MW-3	sulfate	480	400	12/18/2012
510	Will County	MW-3	sulfate	610	400	5/22/2013
511	Will County	MW-3	sulfate	530	400	8/14/2013
512	Will County	MW-3	sulfate	540	400	10/28/2013
513	Will County	MW-3	sulfate	560	400	2/13/2014
514	Will County	MW-3	TDS	1,400	1,200	6/20/2012
515	Will County	MW-4	boron	3.70	2.0	12/13/2010
516	Will County	MW-4	boron	3.30	2.0	3/28/2011
517	Will County	MW-4	boron	3.60	2.0	6/15/2011
518	Will County	MW-4	boron	4.30	2.0	9/15/2011
519	Will County	MW-4	boron	3.00	2.0	12/8/2011
520	Will County	MW-4	boron	4.00	2.0	3/16/2012
521	Will County	MW-4	boron	5.30	2.0	6/20/2012
522	Will County	MW-4	boron	6.20	2.0	9/24/2012
523	Will County	MW-4	boron	5.20	2.0	12/18/2012
524	Will County	MW-4	boron	4.50	2.0	3/5/2013
525	Will County	MW-4	boron	3.80	2.0	5/22/2013
526	Will County	MW-4	boron	5.10	2.0	8/14/2013
527	Will County	MW-4	boron	5.60	2.0	10/28/2013

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

528	Will County	MW-4	boron	4.60	2.0	2/13/2014
529	Will County	MW-4	sulfate	1,500	400	12/13/2010
530	Will County	MW-4	sulfate	1,500	400	3/28/2011
531	Will County	MW-4	sulfate	1,600	400	6/15/2011
532	Will County	MW-4	sulfate	4,800	400	9/15/2011
533	Will County	MW-4	sulfate	1,600	400	12/8/2011
534	Will County	MW-4	sulfate	2,000	400	3/16/2012
535	Will County	MW-4	sulfate	2,800	400	6/20/2012
536	Will County	MW-4	sulfate	3,200	400	9/24/2012
537	Will County	MW-4	sulfate	2,200	400	12/18/2012
538	Will County	MW-4	sulfate	2,000	400	3/5/2013
539	Will County	MW-4	sulfate	1,500	400	5/22/2013
540	Will County	MW-4	sulfate	2,200	400	8/14/2013
541	Will County	MW-4	sulfate	1,300	400	10/28/2013
542	Will County	MW-4	sulfate	1,400	400	2/13/2014
543	Will County	MW-4	TDS	2,500	1,200	12/13/2010
544	Will County	MW-4	TDS	2,600	1,200	3/28/2011
545	Will County	MW-4	TDS	2,800	1,200	6/15/2011
546	Will County	MW-4	TDS	6,000	1,200	9/15/2011
547	Will County	MW-4	TDS	3,100	1,200	12/8/2011
548	Will County	MW-4	TDS	3,700	1,200	3/16/2012
549	Will County	MW-4	TDS	4,300	1,200	6/20/2012
550	Will County	MW-4	TDS	4,400	1,200	9/24/2012
551	Will County	MW-4	TDS	4,000	1,200	12/18/2012
552	Will County	MW-4	TDS	3,600	1,200	3/5/2013
553	Will County	MW-4	TDS	2,900	1,200	5/22/2013
554	Will County	MW-4	TDS	3,500	1,200	8/14/2013
555	Will County	MW-4	TDS	2,400	1,200	10/28/2013
556	Will County	MW-4	TDS	2,800	1,200	2/13/2014
557	Will County	MW-5	boron	2.60	2.0	12/13/2010
558	Will County	MW-5	boron	2.70	2.0	3/28/2011
559	Will County	MW-5	boron	3.20	2.0	6/15/2011
560	Will County	MW-5	boron	4.00	2.0	9/15/2011
561	Will County	MW-5	boron	3.20	2.0	12/8/2011
562	Will County	MW-5	boron	2.90	2.0	3/16/2012
563	Will County	MW-5	boron	2.30	2.0	6/20/2012
564	Will County	MW-5	boron	3.80	2.0	9/24/2012
565	Will County	MW-5	boron	2.50	2.0	12/18/2012
566	Will County	MW-5	boron	2.60	2.0	3/5/2013
567	Will County	MW-5	boron	3.60	2.0	6/5/2013
568	Will County	MW-5	boron	3.50	2.0	8/14/2013
569	Will County	MW-5	boron	4.10	2.0	10/28/2013
570	Will County	MW-5	boron	2.70	2.0	2/13/2014
571	Will County	MW-5	selenium	0.170	0.050	10/28/2013
572	Will County	MW-5	sulfate	580	400	12/13/2010
573	Will County	MW-5	sulfate	570	400	3/28/2011
574	Will County	MW-5	sulfate	540	400	6/15/2011
575	Will County	MW-5	sulfate	690	400	9/15/2011
576	Will County	MW-5	sulfate	500	400	12/8/2011
577	Will County	MW-5	sulfate	410	400	6/20/2012
578	Will County	MW-5	sulfate	540	400	9/24/2012
579	Will County	MW-5	sulfate	650	400	6/5/2013
580	Will County	MW-5	sulfate	500	400	8/14/2013

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

581	Will County	MW-5	sulfate	560	400	10/28/2013
582	Will County	MW-5	sulfate	690	400	2/13/2014
583	Will County	MW-5	TDS	1,300	1,200	3/28/2011
584	Will County	MW-5	TDS	1,400	1,200	6/15/2011
585	Will County	MW-5	TDS	1,500	1,200	9/15/2011
586	Will County	MW-5	TDS	1,600	1,200	6/5/2013
587	Will County	MW-5	TDS	1,300	1,200	10/28/2013
588	Will County	MW-5	TDS	1,400	1,200	2/13/2014
589	Will County	MW-6	boron	2.70	2.0	12/13/2010
590	Will County	MW-6	boron	2.50	2.0	3/28/2011
591	Will County	MW-6	boron	2.40	2.0	6/15/2011
592	Will County	MW-6	boron	3.00	2.0	9/15/2011
593	Will County	MW-6	boron	2.50	2.0	12/8/2011
594	Will County	MW-6	boron	2.50	2.0	3/16/2012
595	Will County	MW-6	boron	2.90	2.0	6/20/2012
596	Will County	MW-6	boron	3.00	2.0	9/24/2012
597	Will County	MW-6	boron	3.00	2.0	12/18/2012
598	Will County	MW-6	boron	2.70	2.0	3/5/2013
599	Will County	MW-6	boron	2.80	2.0	5/22/2013
600	Will County	MW-6	boron	2.90	2.0	8/14/2013
601	Will County	MW-6	boron	3.70	2.0	10/28/2013
602	Will County	MW-6	boron	3.00	2.0	2/13/2014
603	Will County	MW-6	chloride	210	200	3/28/2011
604	Will County	MW-6	sulfate	500	400	12/13/2010
605	Will County	MW-6	sulfate	540	400	3/28/2011
606	Will County	MW-6	sulfate	570	400	6/15/2011
607	Will County	MW-6	sulfate	420	400	9/15/2011
608	Will County	MW-6	sulfate	440	400	12/8/2011
609	Will County	MW-6	sulfate	450	400	6/20/2012
610	Will County	MW-6	sulfate	550	400	9/24/2012
611	Will County	MW-7	boron	4.70	2.0	12/13/2010
612	Will County	MW-7	boron	5.00	2.0	3/28/2011
613	Will County	MW-7	boron	5.70	2.0	6/15/2011
614	Will County	MW-7	boron	3.40	2.0	9/15/2011
615	Will County	MW-7	boron	5.00	2.0	12/8/2011
616	Will County	MW-7	boron	5.10	2.0	3/16/2012
617	Will County	MW-7	boron	5.60	2.0	6/20/2012
618	Will County	MW-7	boron	5.50	2.0	9/24/2012
619	Will County	MW-7	boron	5.10	2.0	12/18/2012
620	Will County	MW-7	boron	4.30	2.0	3/5/2013
621	Will County	MW-7	boron	2.60	2.0	5/22/2013
622	Will County	MW-7	boron	3.50	2.0	8/15/2013
623	Will County	MW-7	boron	3.00	2.0	10/29/2013
624	Will County	MW-7	boron	4.00	2.0	2/20/2014
625	Will County	MW-7	chloride	210	200	2/20/2014
626	Will County	MW-7	sulfate	610	400	12/13/2010
627	Will County	MW-7	sulfate	650	400	3/28/2011
628	Will County	MW-7	sulfate	1,000	400	6/15/2011
629	Will County	MW-7	sulfate	710	400	9/15/2011
630	Will County	MW-7	sulfate	710	400	12/8/2011
631	Will County	MW-7	sulfate	770	400	3/16/2012
632	Will County	MW-7	sulfate	670	400	6/20/2012
633	Will County	MW-7	sulfate	600	400	9/24/2012

Exhibit C: Violations of Illinois Class II groundwater standards at MIdwest Generation's Joliet 29, Powerton, Waukegan, and Will County Generating Stations. This table does not include pH violations.

634	Will County	MW-7	sulfate	480	400	12/18/2012
635	Will County	MW-7	sulfate	460	400	8/15/2013
636	Will County	MW-7	sulfate	530	400	10/29/2013
637	Will County	MW-7	TDS	1,300	1,200	12/13/2010
638	Will County	MW-7	TDS	1,500	1,200	3/28/2011
639	Will County	MW-7	TDS	1,600	1,200	6/15/2011
640	Will County	MW-7	TDS	1,400	1,200	9/15/2011
641	Will County	MW-7	TDS	1,300	1,200	12/8/2011
642	Will County	MW-7	TDS	1,400	1,200	3/16/2012
643	Will County	MW-7	TDS	1,300	1,200	6/20/2012
644	Will County	MW-7	TDS	1,300	1,200	2/20/2014
645	Will County	MW-8	boron	2.30	2.0	9/15/2011
646	Will County	MW-8	boron	2.60	2.0	9/24/2012
647	Will County	MW-8	boron	2.10	2.0	12/18/2012
648	Will County	MW-8	boron	2.40	2.0	8/15/2013
649	Will County	MW-8	boron	3.20	2.0	10/28/2013
650	Will County	MW-8	chloride	270	200	3/29/2011
651	Will County	MW-8	sulfate	440	400	12/13/2010
652	Will County	MW-8	sulfate	440	400	3/29/2011
653	Will County	MW-8	sulfate	420	400	6/15/2011
654	Will County	MW-8	sulfate	600	400	9/15/2011
655	Will County	MW-8	sulfate	630	400	9/24/2012
656	Will County	MW-8	sulfate	440	400	8/15/2013
657	Will County	MW-8	sulfate	650	400	10/28/2013
658	Will County	MW-8	TDS	1,300	1,200	9/15/2011
659	Will County	MW-8	TDS	1,600	1,200	10/28/2013
660	Will County	MW-8	TDS	1,300	1,200	2/20/2014
661	Will County	MW-9	boron	2.20	2.0	12/13/2010
662	Will County	MW-9	boron	2.20	2.0	10/29/2013
663	Will County	MW-9	chloride	280	200	3/28/2011
664	Will County	MW-9	chloride	230	200	6/15/2011
665	Will County	MW-9	chloride	270	200	2/13/2014
666	Will County	MW-9	sulfate	410	400	12/13/2010
667	Will County	MW-9	sulfate	410	400	6/15/2011

EXHIBIT D: Groundwater monitoring data summary for Joliet 29.

Excerpted from Midwest Generation, LLC, 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).

Table 3
Groundwater Analytical Results - AMENDED JULY 2012
Joliet Station #29, Illinois
Midwest Generation
21253.034

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)
Chemical Name		Class I*	12/6/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12	12/6/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12
Antimony	Metals 6020	0.006	0.0043	NS	ND	NS	NS	NS	**0.012**	NS	0.0042	0.0032	ND	ND
Arsenic	Metals 6020	0.05	0.0011	NS	0.0014	NS	NS	NS	ND	NS	ND	ND	ND	ND
Barium	Metals 6020	2.0	0.13	NS	0.14	NS	NS	NS	0.082	NS	0.081	0.1	0.12	0.12
Beryllium	Metals 6020	0.004	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	NS	0.001	NS	NS	NS	ND	NS	ND	ND	ND	ND
Copper	Metals 6020	0.65	0.0032	NS	0.0025	NS	NS	NS	0.0032	NS	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Manganese	Metals 6020	0.15	ND	NS	ND	NS	NS	NS	ND	NS	ND	0.0025	ND	ND
Mercury	Mercury 7470A	0.002	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0034	NS	0.0029	NS	NS	NS	0.0033	NS	ND	0.0027	0.0023	ND
Selenium	Metals 6020	0.05	ND	NS	ND	NS	NS	NS	ND	NS	ND	0.0038	0.0055	0.0048
Silver	Metals 6020	0.05	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Boron	Metals 6020	2	0.31	NS	0.29	NS	NS	NS	0.31	NS	0.35	0.44	0.74	0.22
Sulfate	Dissolved 9038	400	180	NS	81	NS	NS	NS	190	NS	67	110	150	110
Chloride	Dissolved 9251	200	140	NS	170	NS	NS	NS	140	NS	**230**	140	140	280
Nitrogen/Nitrate	Nitrogen By calc	10	1.9	NS	2.9	NS	NS	NS	3.1	NS	1.8	2.2	2.9	6.4
Total Dissolved Solids	Dissolved 2540C	1,200	590	NS	670	NS	NS	NS	600	NS	720	690	750	800
Flouride	Dissolved 4500 FC	4	0.45	NS	0.43	NS	NS	NS	0.62	NS	0.58	0.54	0.51	0.53
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	NS	ND	NS	NS	NS	ND	NS	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	1.9	NS	2.9	NS	NS	NS	3.1	NS	1.8	2.2	2.9	6.4

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND-non detect
NS- not sampled
mg/L- milligrams per liter

Table 3
Groundwater Analytical Results - AMENDED JULY 2012
Joliet Station #29, Illinois
Midwest Generation
21253.034

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)
Chemical Name		Class I*	12/7/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12	12/7/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12
Antimony	Metals 6020	0.006	0.004	ND	ND	0.0065	**0.016**	**0.013**	ND	ND	ND	ND	0.0067	0.0057
Arsenic	Metals 6020	0.05	ND	0.0011	ND	0.0012	0.0016	0.0014	ND	ND	ND	ND	0.0011	ND
Barium	Metals 6020	2.0	0.089	0.085	0.092	0.081	0.084	0.081	0.065	0.067	0.059	0.06	0.069	0.07
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	0.00074	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	0.0013	0.0013	ND	ND	ND	ND	ND	ND	ND	0.0018	0.0028	0.0026
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.22	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	0.1	0.048	ND	0.0076	0.008	0.0095	**0.33**	0.048	0.018	0.066	0.029	0.038
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.011	0.0065	ND	0.0041	0.006	0.0046	0.0067	0.0037	ND	0.0029	0.0038	0.0037
Selenium	Metals 6020	0.05	ND	0.005	ND	ND	ND	ND	0.0025	ND	ND	ND	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	0.00091	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.24	0.36	0.46	0.24	0.23	0.26	0.46	0.37	0.38	0.25	0.34	0.29
Sulfate	Dissolved 9038	400	120	160	120	120	160	190	300	140	84	74	170	210
Chloride	Dissolved 9251	200	**260**	**240**	**300**	160	**260**	**250**	**270**	**270**	**250**	150	200	**210**
Nitrogen/Nitrate	Nitrogen By calc	10	ND	1	2.1	1.1	0.79	ND	0.81	1.6	2.7	1.6	1.4	0.62
Total Dissolved Solids	Dissolved 2540C	1,200	930	1,100	1,000	930	1,100	1,000	1,100	1,000	890	770	970	930
Flouride	Dissolved 4500 FC	4	0.43	0.4	0.41	0.31	0.4	0.39	0.49	0.38	0.44	0.37	0.44	0.41
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrate	Dissolved 4500 NO3	NA	ND	1	2.1	1.1	0.79	ND	0.81	1.6	2.7	1.6	1.4	0.62

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND-non detect
NS- not sampled
mg/L- milligrams per liter

Table 3
Groundwater Analytical Results - AMENDED JULY 2012
Joliet Station #29, Illinois
Midwest Generation
21253.034

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)
Chemical Name		Class I*	12/7/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12	12/7/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	0.004	0.0035	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	ND	ND	ND	0.0011	0.0011	ND	ND	0.0015	ND	ND	0.0018	0.0016
Barium	Metals 6020	2.0	0.061	0.092	0.053	0.053	0.062	0.069	0.075	0.12	0.082	0.094	0.11	0.13
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	0.0016	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	0.0019	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	0.0065	ND	ND	ND	ND	ND	0.14	0.033	ND	0.036	0.024	0.015
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	ND	ND	ND	0.0021	ND	ND	0.0056	0.0025	ND	ND	ND	ND
Selenium	Metals 6020	0.05	ND	0.0072	ND	ND	0.005	ND	0.0029	0.0034	ND	ND	0.0054	0.0051
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	0.00077	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.42	0.52	0.47	0.57	0.49	0.54	0.32	0.44	0.32	0.27	0.3	0.25
Sulfate	Dissolved 9038	400	110	160	100	140	140	190	140	140	87	100	130	110
Chloride	Dissolved 9251	200	150	**240**	**220**	120	190	**210**	130	**270**	140	140	130	**240**
Nitrogen/Nitrate	Nitrogen By calc	10	ND	1.2	1.3	1.1	1.5	0.33	ND	1.3	0.91	0.31	0.36	ND
Total Dissolved Solids	Dissolved 2540C	1,200	750	990	850	800	900	930	650	1,000	650	620	710	800
Flouride	Dissolved 4500 FC	4	0.4	0.34	0.39	0.28	0.34	0.32	0.4	0.36	0.44	0.29	0.44	0.36
Nitrogen/Nitrate	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	ND	1.2	1.3	1.1	1.5	0.33	ND	1.3	0.91	0.31	0.36	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND-non detect
NS- not sampled
mg/L- milligrams per liter

Table 3
Groundwater Analytical Results - AMENDED JULY 2012
Joliet Station #29, Illinois
Midwest Generation
21253.034

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)
Chemical Name		Class I*	12/7/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12	12/6/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.001	ND	ND	ND	0.0014	0.001	ND	ND	ND	ND	ND	ND
Barium	Metals 6020	2.0	0.13	0.11	0.072	0.092	0.11	0.13	0.054	0.055	0.026	0.048	0.057	0.049
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	0.011	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	0.0025	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	3.8	ND	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.29**	0.014	ND	0.08	0.0073	0.015	0.0051	0.0026	0.017	ND	ND	0.0042
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0045	ND	ND	0.014	ND	ND	0.0025	ND	ND	0.012	ND	ND
Selenium	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.51	0.39	0.25	0.29	0.35	0.3	0.29	0.16	0.12	0.2	0.16	0.13
Sulfate	Dissolved 9038	400	250	120	85	110	160	140	210	87	52	120	170	130
Chloride	Dissolved 9251	200	**430**	**320**	140	99	140	**300**	130	**350**	150	79	120	**410**
Nitrogen/Nitrate	Nitrogen By calc	10	ND	1.2	0.76	0.27	0.6	ND	0.33	2.2	1.9	0.95	0.86	ND
Total Dissolved Solids	Dissolved 2540C	1,200	1,200	970	580	650	780	870	670	990	580	690	800	1000
Flouride	Dissolved 4500 FC	4	0.36	0.31	0.35	0.27	0.35	0.31	0.51	0.36	0.45	0.25	0.31	0.38
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	ND	1.2	0.76	0.27	0.6	ND	0.33	2.2	1.9	0.95	0.86	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND-non detect
NS- not sampled
mg/L- milligrams per liter

Table 3
Groundwater Analytical Results - AMENDED JULY 2012
Joliet Station #29, Illinois
Midwest Generation
21253.034

Chemical Name	Sample Analysis Method	Groundwater Quality Standard (mg/L) Class I*	MW-9 (mg/L) 12/6/10	MW-9 (mg/L) 3/23/11	MW-9 (mg/L) 6/14/11	MW-9 (mg/L) 9/14/11	MW-9 (mg/L) 12/7/11	MW-9 (mg/L) 3/15/12	MW-10 (mg/L) 12/6/10	MW-10 (mg/L) 3/23/11	MW-10 (mg/L) 6/14/11	MW-10 (mg/L) 9/14/11	MW-10 (mg/L) 12/7/11	MW-10 (mg/L) 3/15/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0012	ND
Barium	Metals 6020	2.0	0.031	0.029	0.032	0.029	0.03	0.021	0.05	0.051	0.039	0.039	0.036	0.04
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	0.00059	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	0.0047	0.0034	0.0062	0.011	0.0075	0.0021	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	0.0026	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	0.18	7.3	3.8	1.5	5.5	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**1.1**	**1.6**	**0.95**	**0.82**	**0.66**	**1.3**	0.12	0.0076	ND	ND	ND	ND
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0094	0.0072	0.013	0.014	0.011	0.0054	0.0052	0.0029	ND	0.0087	0.0024	ND
Selenium	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.36	0.32	0.29	0.35	0.31	0.38	0.5	0.54	0.54	0.41	0.52	0.52
Sulfate	Dissolved 9038	400	**1,600**	**1,100**	**580**	**750**	130	**1,600**	130	130	89	100	190	250
Chloride	Dissolved 9251	200	140	**230**	**290**	190	190	170	200	**300**	7.1	170	180	180
Nitrogen/Nitrate	Nitrogen By calc	10	ND	ND	0.97	0.36	0.22	ND	0.39	2.3	2.7	2.6	1.4	ND
Total Dissolved Solids	Dissolved 2540C	1,200	**2,600**	**2,400**	**1,500**	**1,700**	**2,400**	**2,600**	860	1,100	980	730	890	890
Flouride	Dissolved 4500 FC	4	0.61	0.52	0.47	0.39	0.5	0.45	0.43	0.39	0.42	0.41	0.45	0.41
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	ND	ND	0.97	0.36	0.22	ND	0.39	2.3	2.7	2.6	1.4	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND-non detect
NS- not sampled
mg/L- milligrams per liter

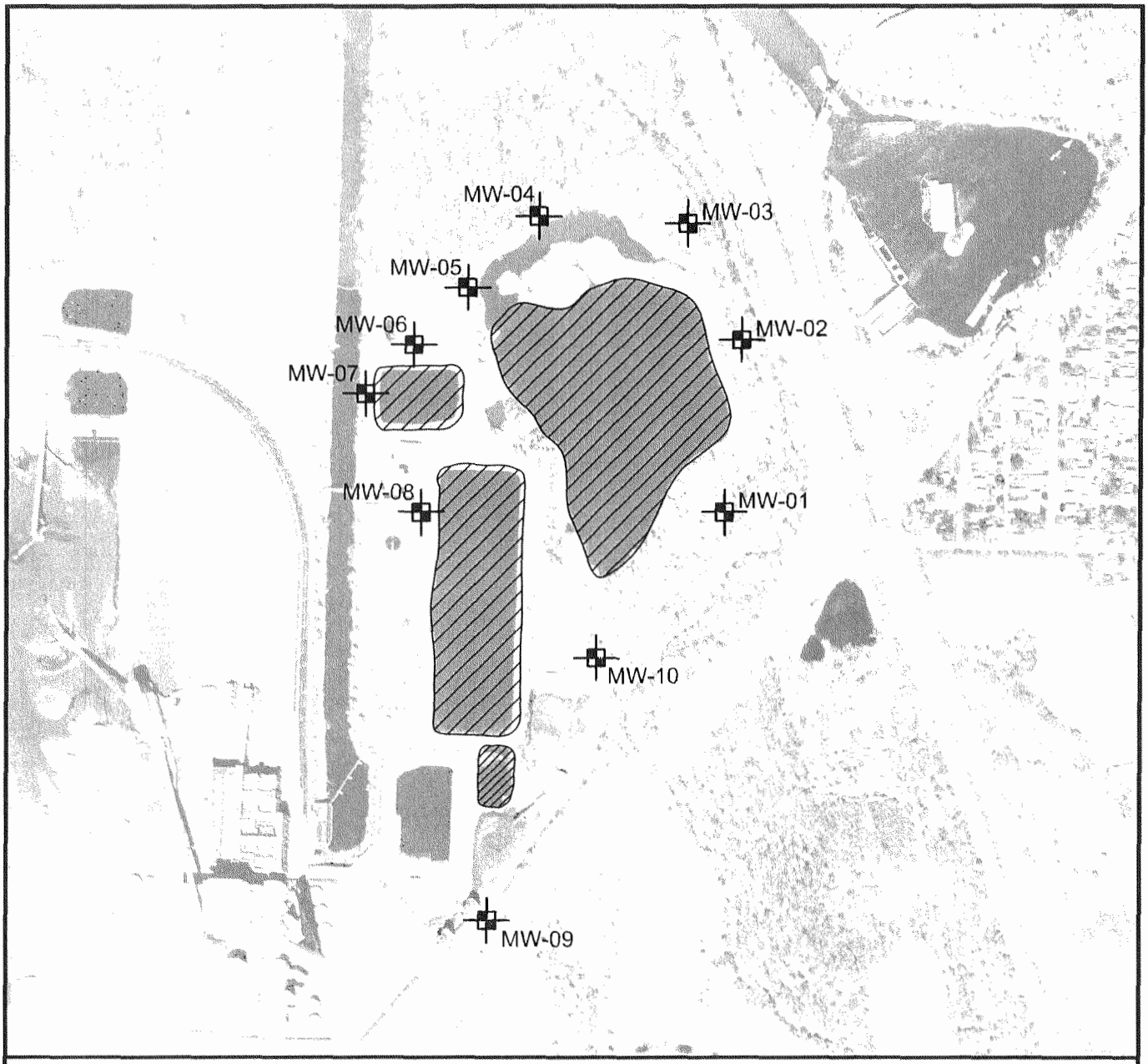
Table 3
Groundwater Analytical Results - AMENDED JULY 2012
Joliet Station #29, Illinois
Midwest Generation
21253.034

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)
Chemical Name		Class I*	12/6/10	3/23/11	6/14/11	9/14/11	12/7/11	3/15/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0013	0.0016	ND	0.0016	0.0019	0.0017
Barium	Metals 6020	2.0	0.064	0.076	0.051	0.054	0.057	0.067
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	0.052	0.0047	ND	0.0053	0.0047	ND
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0022	ND	ND	ND	ND	ND
Selenium	Metals 6020	0.05	ND	0.0054	ND	0.0026	0.0033	0.0043
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.47	**2.6**	**2.2**	1.1	1.2	1.4
Sulfate	Dissolved 9038	400	140	150	110	110	160	140
Chloride	Dissolved 9251	200	160	**270**	**280**	86	140	**240**
Nitrogen/Nitrate	Nitrogen By calc	10	0.39	1.1	0.92	0.31	0.6	0.3
Total Dissolved Solids	Dissolved 2540C	1,200	770	1,000	710	590	790	850
Flouride	Dissolved 4500 FC	4	0.34	0.31	0.36	0.32	0.31	0.3
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	0.39	1.1	0.92	0.31	0.6	0.3

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND-non detect
NS- not sampled
mg/L- milligrams per liter

EXHIBIT E: Maps of groundwater monitoring wells at Powerton.

Excerpted from Midwest Generation, LLC, Hydrogeologic Assessment Report – Powerton Generating Station (Feb. 2011); Midwest Generation, LLC, Quarterly Groundwater Monitoring Results – Second Quarter 2011 – Powerton Generating Station – Bypass Cleaning Basin (Aug. 1, 2011).; Midwest Generation, LLC, Bi-Monthly Groundwater Monitoring Results – April 2011 – Powerton Generating Station – Metal Cleaning Basin (Aug. 1, 2011).



LEGEND

MW-01 MONITORING WELL LOCATION

NOTE:
ACCURATE GROUNDWATER FLOW DIRECTION IS UNKNOWN AND LIKELY SHIFTS BOTH SEASONALLY AND AS A RESULT OF VARYING RIVER ELEVATIONS. GROUNDWATER LIKELY FLOWS WITHIN THE RANGE OF DEPICTED GROUNDWATER FLOW DIRECTIONS.

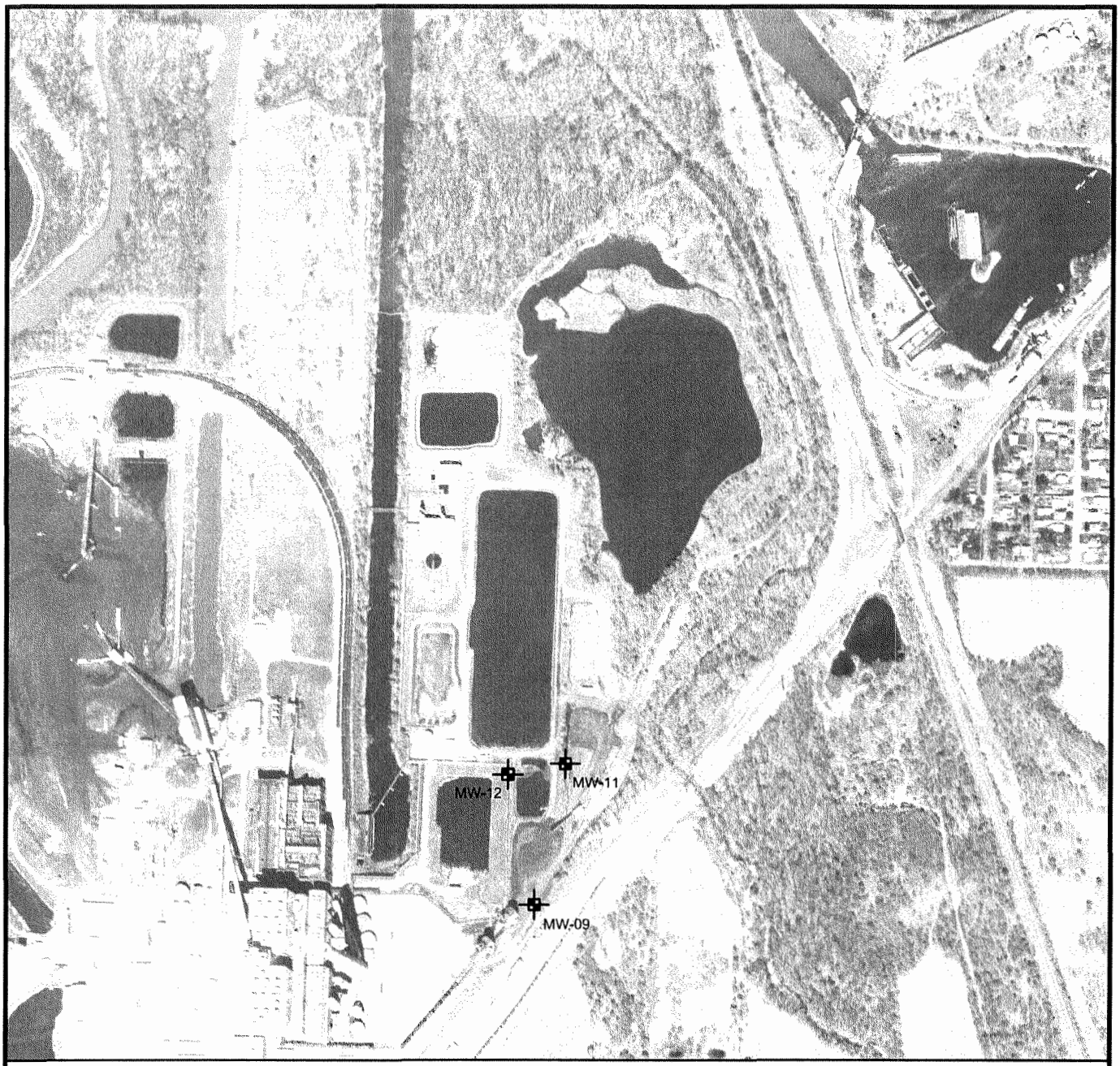
N

0 600'

GRAPHIC SCALE

AERIAL IMAGE SOURCE:
2005 ORTHOPHOTO TAKEN FROM THE ILLINOIS NATURAL RESOURCES CLEARINGHOUSE

Date: FEB. 2011	FIGURE 3 MONITORING WELL LOCATION MAP	**PATRICK ENGINEERING INC.**
Proj No.: 21053.070	**POWERTON STATION PEKIN, ILLINOIS**	4970 Varsity Drive Lisle, Illinois 60532-4101 TEL. (630) 795-7200 FAX (630) 724-1681 PROFESSIONAL DESIGN FIRM LICENSE NO. 184-000409
App. By: RMF		



LEGEND

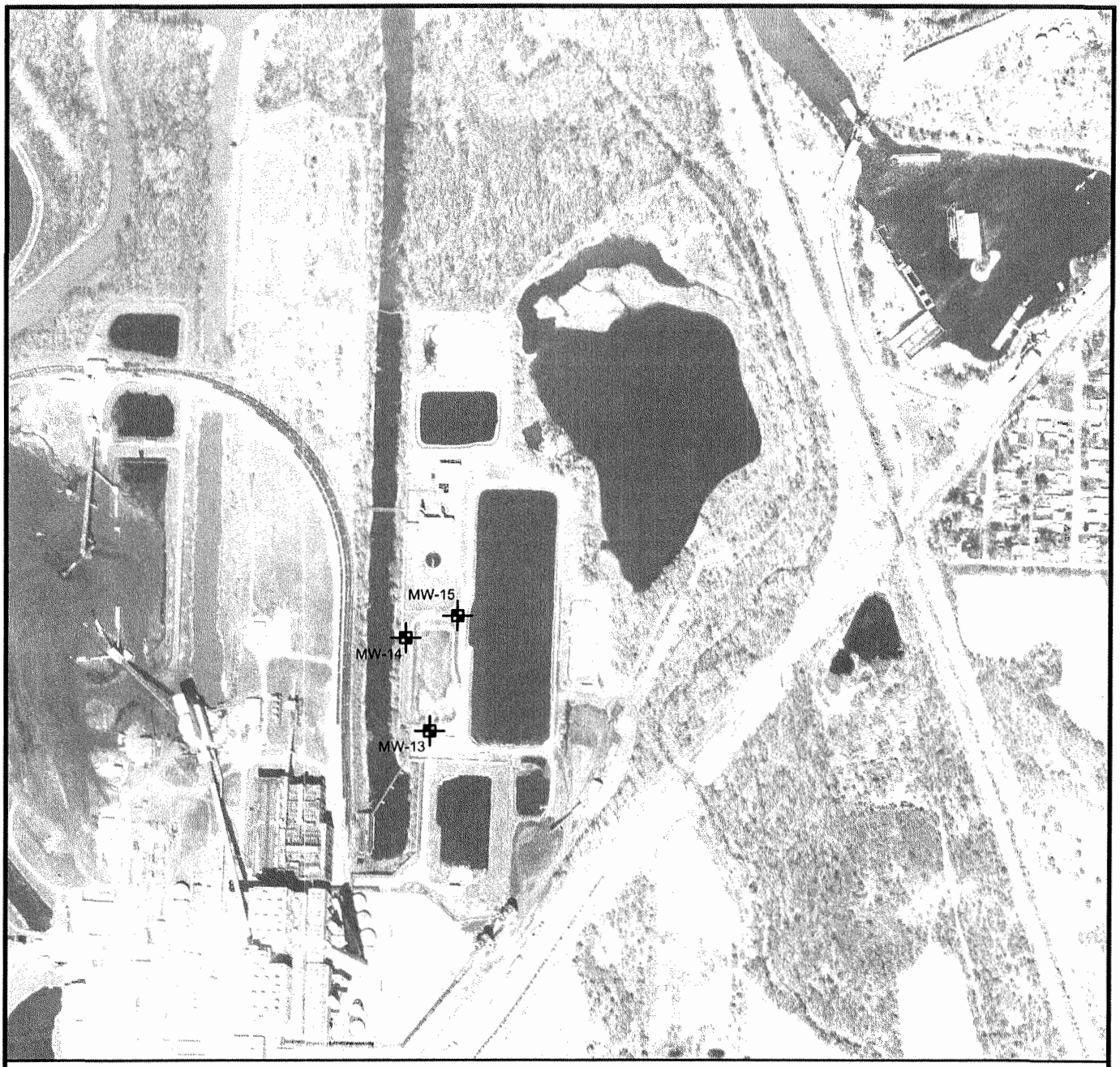
MW-01 Existing Monitoring Well Location

N

1" = 600'

AERIAL IMAGE SOURCE:
2005 ORTHOPHOTO TAKEN FROM THE ILLINOIS NATURAL RESOURCES CLEARINGHOUSE

Date: JUNE 2011	EXISTING MONITORING WELL LOCATION MAP Bypass Basin Map	PATRICK ENGINEERING INC.
Proj No.: 21153.018	POWERTON STATION PEKIN, ILLINOIS	4970 Varsity Drive Lisle, Illinois 60532-4101 TEL. (630) 795-7200 FAX (630) 724-1681 PROFESSIONAL DESIGN FIRM LICENSE NO. 184-000409
App. By: RMF		



LEGEND

MW-01 Existing Monitoring Well Location

N

1" = 600'

AERIAL IMAGE SOURCE:
2005 ORTHOPHOTO TAKEN FROM THE ILLINOIS NATURAL RESOURCES CLEARINGHOUSE

Date: APRIL 2011	EXISTING MONITORING WELL LOCATION MAP Metal Cleaning Basin Map	**PATRICK ENGINEERING INC.**
Proj No.: 21153.018	POWERTON STATION PEKIN, ILLINOIS	4970 Varsity Drive Lisle, Illinois 60532-4101 TEL. (630) 795-7200 FAX (630) 724-1681 PROFESSIONAL DESIGN FIRM LICENSE NO. 184-000409
App. By: RMF		

EXHIBIT F: Groundwater monitoring data summary for Powerton.

Excerpted from Midwest Generation, LLC, Quarterly Groundwater Monitoring Results – First Quarter 2012 – Amended – Revisions to Original Report Submitted May 11, 2012 – Powerton Generating Station – Ash Impoundments (July 30, 2012).

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)
Chemical Name		Class I*	12/15/10	3/25/11	6/14/11	9/19/11	12/12/11	3/19/12	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	0.0018	0.0015	0.0017	ND	ND	ND
Barium	Metals 6020	2.0	0.044	0.026	0.034	0.056	0.044	0.038	0.042	0.025	0.053	0.059	0.066	0.049
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	0.0057	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	0.0077	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	ND	ND	ND	ND	ND	ND	ND	0.0012	0.0022	ND	ND	ND
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.01	0.008	ND	0.0069	0.0095	ND	0.0086	0.0096	0.0053	0.01	0.0073	ND
Selenium	Metals 6020	0.05	0.0016	0.0022	0.0016	0.0036	0.0027	0.0025	0.0017	0.0032	0.0014	0.0032	0.0037	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.013
Boron	Metals 6020	2	0.45	0.26	0.33	1.0	0.48	0.29	0.38	0.23	0.35	0.83	0.69	0.27
Sulfate	Dissolved 9038	400	50	30	39	83	31	61	52	42	53	70	69	55
Chloride	Dissolved 9251	200	46	37	40	41	26	53	45	43	44	46	40	53
Nitrogen/Nitrate	Nitrogen By calc	10	7.2	4.3	5.7	11	4.1	7.3	7.5	4.5	4.7	4.3	6.9	5.1
Total Dissolved Solids	Dissolved 2540C	1,200	490	340	410	510	440	470	480	420	470	460	490	440
Fluoride	Dissolved 4500 FC	4	0.28	0.32	0.38	ND	ND	ND	ND	0.3	0.35	ND	ND	ND
Radium 226 (pCi/L)	EPA 903.1	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Radium 228 (pCi/L)	EPA 904.0	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRIOT ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)
Chemical Name		Class I*	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0017	ND	0.0011	0.0012	0.0012	0.0012	ND	ND	ND	ND	ND	ND
Barium	Metals 6020	2.0	0.038	0.03	0.063	0.081	0.076	0.052	0.055	0.052	0.058	0.041	0.048	0.043
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	0.0045	ND	ND	0.0044	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	0.0026	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	0.012	0.0042	ND	ND	ND	ND	0.0033	0.01	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	0.042	ND	ND	ND	0.017	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	0.0047	0.0023	ND	0.0037	0.0014	ND	ND	**0.68**	**0.41**	**0.69**	**0.35**	0.089
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.011	0.0095	ND	0.008	0.0078	ND	0.012	0.012	0.0067	0.011	0.01	0.0055
Selenium	Metals 6020	0.05	ND	0.0036	0.0015	0.0036	0.0021	0.0067	0.0022	0.0037	0.0022	0.0039	0.002	0.0085
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	0.012	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.75	0.18	0.24	0.64	0.7	0.56	0.77	0.83	0.33	0.84	0.79	0.78
Sulfate	Dissolved 9038	400	64	42	47	66	45	72	110	140	48	61	6.7	160
Chloride	Dissolved 9251	200	39	52	59	62	39	54	150	77	43	86	8.1	58
Nitrogen/Nitrate	Nitrogen By calc	10	9.4	5.2	5.4	0.2	0.2	2.1	0.34	0.73	2.7	0.06	0.07	0.65
Total Dissolved Solids	Dissolved 2540C	1,200	480	430	440	460	480	450	680	620	470	580	520	660
Fluoride	Dissolved 4500 FC	4	0.3	0.35	0.41	0.35	ND	ND	0.3	0.39	0.43	0.31	ND	ND
Radium 226 (pCi/L)	EPA 903.1	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Radium 228 (pCi/L)	EPA 904.0	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)
Chemical Name		Class I*	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0011	ND	ND	ND	0.001	ND	0.0042	0.0024	0.0029	0.0031	0.0036	0.002
Barium	Metals 6020	2.0	0.053	0.048	0.046	0.071	0.065	0.054	0.11	0.092	0.1	0.1	0.12	0.097
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	0.0044	0.0042	ND	0.0066	ND	ND	0.006	0.0083	0.0045	0.0085	0.0056	ND
Cobalt	Metals 6020	1.0	0.0025	0.0023	ND	0.0027	0.0022	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	0.0036	0.0061	ND	ND	ND	0.0032	0.0042	ND	0.16
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	0.13	0.05	0.046	0.082	0.036	ND	1.6	1.6	1.7	1.8	1.9	1.7
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.51**	**0.49**	**0.48**	**0.64**	**0.5**	**0.26**	**0.68**	**0.68**	**0.63**	**0.66**	**0.63**	**0.61**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.014	0.013	0.0077	0.014	0.014	0.008	0.0091	0.014	0.0078	0.0099	0.0089	ND
Selenium	Metals 6020	0.05	0.0019	0.003	ND	0.0045	0.0023	0.0028	0.0034	ND	ND	0.0025	0.0033	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	0.0064	ND	ND	ND	ND	0.049
Boron	Metals 6020	2	0.95	0.93	0.79	0.79	0.77	0.82	0.5	0.35	0.43	0.61	0.63	0.39
Sulfate	Dissolved 9038	400	160	170	110	250	170	120	210	250	280	260	170	250
Chloride	Dissolved 9251	200	150	120	89	160	140	82	180	200	160	**210**	150	150
Nitrogen/Nitrate	Nitrogen By calc	10	ND	ND	0.08	ND	ND	1.6	0.037	ND	ND	0.04	0.06	ND
Total Dissolved Solids	Dissolved 2540C	1,200	740	680	640	890	820	590	950	990	1,100	970	1,000	1,100
Fluoride	Dissolved 4500 FC	4	0.27	0.36	0.43	0.25	ND	ND	0.65	0.61	0.63	0.64	0.5	0.47
Radium 226 (pCi/L)	EPA 903.1	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Radium 228 (pCi/L)	EPA 904.0	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)
Chemical Name		Class I*	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.026	**0.085**	**0.12**	**0.18**	**0.23**	**0.23**	0.0052	0.0039	0.0044	0.0036	0.0052	0.0038
Barium	Metals 6020	2.0	0.55	0.52	0.57	0.57	0.59	0.57	0.11	0.12	0.11	0.11	0.13	0.14
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	0.0026	ND	0.0015	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	0.0088	0.0075	0.0061	0.011	ND	ND	0.0059	0.0081	0.0059	0.0084	0.0053	ND
Cobalt	Metals 6020	1.0	0.017	0.0056	0.007	0.0055	0.006	0.0067	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	0.14	ND	ND	ND	ND	ND	ND	ND	0.0036	0.0037	0.01	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	**8**	**7.5**	**10**	**22**	**26**	**31**	0.56	2.1	1.7	0.97	0.94	2.3
Lead	Metals 6020	0.0075	**0.039**	ND	0.0014	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**3.5**	**5.9**	**6.4**	**12**	**12**	**11**	0.15	**0.27**	**0.29**	**0.18**	**0.2**	**0.27**
Mercury	Mercury 7470A	0.002	ND	ND	0.00025	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.045	0.021	0.022	0.026	0.022	0.018	0.011	0.013	0.0076	0.007	0.009	0.0054
Selenium	Metals 6020	0.05	0.0043	0.0026	0.0025	0.0073	0.0054	0.0013	0.0036	0.0013	ND	0.0031	0.0036	0.0018
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	0.076	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	0.61	0.44	0.43	0.38	0.34	0.35	0.93	0.72	0.64	0.82	0.82	0.57
Sulfate	Dissolved 9038	400	120	49	25	9.1	3.3	3	160	240	140	200	200	300
Chloride	Dissolved 9251	200	170	200	140	130	81	99	180	**210**	140	**210**	190	170
Nitrogen/Nitrate	Nitrogen By calc	10	0.043	0.08	ND	0.31	0.03	ND	ND	ND	0.1	1.6	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	860	1,100	**1,300**	**1,300**	**1,300**	**1,400**	890	990	970	940	990	1,200
Fluoride	Dissolved 4500 FC	4	0.47	0.42	0.58	0.94	0.47	0.54	0.77	0.76	0.81	0.84	0.75	0.7
Radium 226 (pCi/L)	EPA 903.1	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Radium 228 (pCi/L)	EPA 904.0	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)
Chemical Name		Class I*	12/16/10	2/15/11	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12	12/15/10	3/25/11	6/16/11	9/19/11	12/12/11	3/19/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	ND	ND	0.0018	0.0017	ND	0.0012	ND	ND	ND	0.0015	ND	ND	ND
Barium	Metals 6020	2.0	0.038	0.042	0.042	0.038	0.03	0.038	0.035	0.24	0.28	0.36	0.25	0.26	0.26
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	0.0026	0.0027	0.0039	0.0025	0.0026	0.0024
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0041	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	0.19	0.066	ND	ND	ND	0.014	ND	ND	0.044	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.23**	**0.43**	**0.45**	**0.48**	0.14	**0.28**	**0.22**	**2.1**	**2.8**	**3.8**	**2.3**	**2.3**	**2.3**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.01	0.011	0.0093	0.0063	0.0065	0.0088	ND	0.015	0.016	0.015	0.01	0.013	0.0091
Selenium	Metals 6020	0.05	0.0024	ND	0.0072	0.0017	0.0043	0.0041	0.0072	0.0042	0.0064	0.0043	0.0057	0.0065	0.0056
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	2.1	1.9	1.9	1.9	2.5	2.7	2.6	0.48	0.48	0.52	0.42	0.57	0.54
Sulfate	Dissolved 9038	400	110	99	110	110	130	110	120	62	64	67	64	72	76
Chloride	Dissolved 9251	200	25	33	28	28	30	30	30	40	43	43	49	42	45
Nitrogen/Nitrate	Nitrogen By calc	10	2.9	3.7	5.6	5.6	3.7	2.6	5	3	4	2.1	4.5	4.9	6
Total Dissolved Solids	Dissolved 2540C	1,200	500	470	510	540	500	520	530	530	520	650	470	540	530
Fluoride	Dissolved 4500 FC	4	ND	0.32	0.31	0.34	0.25	ND	ND	ND	0.3	0.36	ND	ND	ND
Radium 226 (pCi/L)	EPA 903.1	20	0.673	0.728	NS	0.955	0.43	0.621	0.592	NS	NS	NS	NS	NS	NS
Radium 228 (pCi/L)	EPA 904.0	20	0.941	0.983	NS	0.974	0.966	0.966	0.831	NS	NS	NS	NS	NS	NS

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS- not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK engineering	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-11 (mg/L)	MW-12 (mg/L)	MW-12 (mg/L)	MW-12 (mg/L)	MW-12 (mg/L)	MW-12 (mg/L)	MW-12 (mg/L)
Chemical Name		Class I*	12/16/10	2/15/11	6/16/11	9/19/11	12/12/11	3/19/12	12/15/10	2/15/11	6/16/11	9/19/11	12/12/11	3/19/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0021	0.0025	0.0019	0.0016	0.0019	0.0021	0.0088	0.013	0.0064	0.0087	0.0089	0.0042
Barium	Metals 6020	2.0	0.17	0.11	0.18	0.11	0.11	0.13	0.089	0.11	0.091	0.085	0.09	0.071
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	0.0056	0.0044	0.0071	0.0047	ND
Cobalt	Metals 6020	1.0	0.0028	0.0041	0.0024	ND	ND	0.0024	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	0.0032	0.0032	0.0043	ND	ND	ND	ND	ND	0.0032	0.0036	0.0031	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	0.44	0.01	0.029	0.018	ND	ND	**5.5**	**6.3**	**5.6**	4	3.1	4.8
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**3.2**	**3.6**	**2.9**	**2.2**	**2.5**	**2.9**	**0.32**	**0.58**	**0.26**	**0.37**	**0.25**	0.13
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.019	0.016	0.013	0.011	0.013	0.011	0.0096	0.01	0.0072	0.0075	0.0091	0.0075
Selenium	Metals 6020	0.05	0.0026	0.0015	0.0018	0.004	0.0031	0.0039	0.0026	0.0027	ND	0.0023	0.0034	0.0043
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	0.012	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	1.6	1.8	1.6	1.5	1.8	**2.3**	1.6	1.4	1.3	1.2	1.3	0.92
Sulfate	Dissolved 9038	400	170	160	210	140	160	130	290	270	350	360	300	310
Chloride	Dissolved 9251	200	70	66	120	53	87	54	170	180	180	190	**210**	170
Nitrogen/Nitrate	Nitrogen By calc	10	0.41	0.17	0.04	0.74	1.5	0.39	ND	ND	0.14	ND	ND	0.04
Total Dissolved Solids	Dissolved 2540C	1,200	740	710	930	620	730	740	980	1,000	1,100	970	970	1,000
Fluoride	Dissolved 4500 FC	4	0.53	0.56	0.67	0.58	0.44	0.42	0.71	0.61	0.64	0.74	0.61	0.46
Radium 226 (pCi/L)	EPA 903.1	20	0.445	0.174	0.929	0.489	0.733	0.621	0.617	0.207	0.893	0.803	0.923	0.445
Radium 228 (pCi/L)	EPA 904.0	20	0.915	0.967	0.914	0.949	1.03	0.683	0.97	0.973	0.956	0.996	0.952	0.713

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-13 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)	MW-14 (mg/L)
Chemical Name		Class I*	12/15/10	2/15/11	4/25/11	6/16/11	8/9/11	10/13/11	12/12/11	4/10/12	12/15/10	2/15/11	4/25/11	6/16/11	8/9/11	10/13/11	12/12/11	4/10/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.011	0.0069	0.0063	0.0057	0.0048	0.0066	0.023	0.027	0.024	0.019	0.0084	0.005	0.0062	0.015	0.0033	0.0039
Barium	Metals 6020	2.0	0.11	0.052	0.073	0.059	0.046	0.083	0.21	0.14	0.034	0.034	0.036	0.04	0.041	0.04	0.045	0.045
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	0.0062	0.0042	0.0045	ND	ND	0.01	0.0055	0.0055	ND	0.0046	0.0078	0.0049	0.0076	0.0096	0.0065	0.0057
Cobalt	Metals 6020	1.0	0.0031	0.0026	0.0023	0.0022	0.0031	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	0.0068	0.0037	0.0041	0.004	0.004	0.0055	0.0066	0.0068	0.0037	0.0035	0.0074	0.0071	0.0064	0.0055	0.025	0.0067
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	0.69	0.052	0.077	ND	0.043	ND	0.11	0.2	2.2	0.94	0.036	0.3	0.71	2	0.12	0.77
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0035
Manganese	Metals 6020	0.15	**5**	**3.8**	**2.7**	**2.9**	**2.6**	**3.6**	**3.5**	**3.5**	**0.68**	**0.81**	**0.29**	**0.36**	**0.57**	**0.84**	0.067	**0.63**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.03	0.023	0.021	0.018	0.016	0.015	0.022	0.02	0.015	0.015	0.02	0.016	0.016	0.011	0.015	0.018
Selenium	Metals 6020	0.05	0.0046	0.0046	0.0045	0.0029	0.0056	0.004	0.0036	0.0037	0.0024	0.0015	**0.065**	0.0035	0.003	0.0017	0.0037	0.022
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	0.0019	0.0018	**0.0035**	**0.0039**	**0.0027**	0.0016	0.0016	**0.0034**
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	0.06	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0084
Boron	Metals 6020	2	**3.9**	**3.1**	**2.6**	**3.0**	**2.7**	**3.0**	**4.1**	**4.0**	2.0	1.9	1.9	1.9	1.8	1.9	1.9	1.8
Sulfate	Dissolved 9038	400	**1,400**	**770**	**580**	**540**	**440**	**660**	**1,100**	**1,100**	**960**	**820**	**770**	**810**	**940**	**850**	**880**	**990**
Chloride	Dissolved 9251	200	160	120	100	86	110	110	180	170	160	160	160	160	**240**	200	200	190
Nitrogen/Nitrate	Nitrogen By calc	10	0.14	1.3	1.8	2.2	3.6	1.6	0.07	0.06	0.036	ND	1	0.27	0.05	ND	0.33	0.31
Total Dissolved Solids	Dissolved 2540C	1,200	**2,600**	**1,600**	**1,400**	**1,300**	**1,100**	**1,500**	**2,100**	**2,300**	**1,800**	**1,700**	**1,800**	**1,900**	**2,000**	**1,800**	**1,800**	**2,200**
Fluoride	Dissolved 4500 FC	4	0.28	0.29	0.31	0.44	0.38	0.3	ND	0.32	1.7	1.6	1.1	1.3	1.4	0.88	1.1	1
Radium 226 (pCi/L)	EPA 903.1	20	0.603	0.165	NA	0.741	0	0.444	0.955	0.678	0.577	0.163	NA	0.893	0.474	0.0983	0.857	0.601
Radium 228 (pCi/L)	EPA 904.0	20	0.988	0.966	0.73	1	0.198	0.74	1.01	0.883	0.944	0.96	0.737	0.947	1.1	–	0.985	0.929

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Powerton Generation Station
Pekin, Illinois
Midwest Generation
21253.022

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)	MW-15 (mg/L)
Chemical Name		Class I*	12/15/10	2/15/11	4/25/11	6/16/11	8/9/11	10/13/11	12/12/11	4/10/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0099	0.0092	0.0064	0.0052	0.0053	0.011	0.0097	0.0061
Barium	Metals 6020	2.0	0.058	0.052	0.061	0.11	0.057	0.06	0.063	0.075
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	0.0042	0.0061	0.0092	0.0054	0.0091	0.0062	0.0062	0.0071
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	0.0039	0.005	0.0041	0.0037	0.0031	0.0039
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	3.3	2.4	2.1	0.7	2.1	2.6	2.1	0.0011
Lead	Metals 6020	0.0075	ND	ND	0.0012	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.56**	**0.42**	**0.36**	**0.6**	**0.37**	**0.48**	**0.39**	**0.25**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.013	0.011	0.012	0.015	0.01	0.011	0.011	0.01
Selenium	Metals 6020	0.05	0.0042	0.0079	0.017	0.004	0.002	0.004	0.0047	0.025
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	1.6	1.4	1.5	1.6	1.3	1.2	1.2	1.4
Sulfate	Dissolved 9038	400	300	220	270	**650**	250	180	140	200
Chloride	Dissolved 9251	200	180	190	190	170	**210**	180	200	200
Nitrogen/Nitrate	Nitrogen By calc	10	0.03	0.086	0.04	0.07	0.05	ND	0.07	0.12
Total Dissolved Solids	Dissolved 2540C	1,200	1,000	1,000	1,100	**1,600**	1,000	890	840	1,000
Fluoride	Dissolved 4500 FC	4	0.69	0.75	0.6	0.73	0.76	0.77	0.75	0.79
Radium 226 (pCi/L)	EPA 903.1	20	0.666	0.174	NA	0.946	0.567	0.372	0.979	0.508
Radium 228 (pCi/L)	EPA 904.0	20	0.902	0.968	0.689	0.983	0.0954	1.04	0.937	0.901

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NS-not sampled
ND- non detect
mg/L- milligrams per liter

EXHIBIT G: Map of groundwater monitoring wells at Waukegan.

Excerpted from Midwest Generation, LLC, Hydrogeologic Assessment Report – Waukegan Generating Station (Feb. 2011).

LEGEND

MW-01 MONITORING WELL LOCATION

N

0 600'

GRAPHIC SCALE

AERIAL IMAGE SOURCE:
LANDISCOR AERIAL INFORMATION INC., JULY 2008

Date: FEB. 2011	FIGURE 3 MONITORING WELL LOCATION MAP	PATRICK ENGINEERING INC.
Proj No.: 21053.070	**WAUKEGAN STATION WAUKEGAN, ILLINOIS**	4970 Varsity Drive Lisle, Illinois 60532-4101 TEL. (630) 795-7200 FAX (630) 724-1681
App. By: RMF		PROFESSIONAL DESIGN FIRM LICENSE NO. 184-000409

EXHIBIT H: Groundwater monitoring data summary for Waukegan County.

Excerpted from Midwest Generation, LLC, Quarterly Groundwater Monitoring Results – First Quarter 2012 – Amended – Revisions to Original Report Submitted May 11, 2012 – Waukegan Generating Station – Ash Impoundments (July 30, 2012).

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Waukegan Station
Waukegan, Illinois
Midwest Generation
21153.033

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)
Chemical Name		Class I*	10/25/10	3/24/11	6/13/11	9/13/11	12/6/11	3/14/12	10/25/10	3/24/11	6/13/11	9/13/11	12/6/11	3/14/12
Antimony	Metals 6020	0.006	0.0052	ND	ND	ND	ND	ND	**0.015**	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	**0.054**	0.04	**0.17**	**0.077**	**0.057**	**0.078**	0.025	0.016	0.012	0.0087	0.0094	0.0094
Barium	Metals 6020	2.0	0.023	0.022	0.02	0.038	0.051	0.034	0.0091	0.014	0.024	0.02	0.023	0.017
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	0.02	0.013	ND	ND	ND	ND	0.014	0.019	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	ND	0.0027	0.0086	0.02	0.011	0.0052	0.0034	0.018	0.032	0.038	0.035	0.028
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Selenium	Metals 6020	0.05	0.031	0.03	0.016	0.039	0.032	0.037	0.026	0.0085	0.028	0.022	0.0086	0.0046
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	**2.6**	2	**2.6**	**2.5**	**2.8**	**2.5**	**2.2**	**2.2**	2	1.7	1.9	2
Sulfate	Dissolved 9038	400	350	230	260	280	330	390	230	160	150	200	180	200
Chloride	Dissolved 9251	200	39	48	52	41	32	47	42	45	46	45	50	53
Nitrogen/Nitrate	Nitrogen By calc	10	ND	ND	ND	0.52	0.3	ND	ND	ND	0.23	0.12	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	460	470	460	570	750	630	410	400	410	460	490	400
Fluoride	Dissolved 4500 FC	4	0.45	0.59	0.71	0.33	0.46	0.46	0.35	0.53	0.8	0.56	0.67	0.88
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	0.021	0.1	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	ND	ND	ND	0.52	0.32	ND	ND	ND	0.23	0.12	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NA - upgradient value not calculated due to non-detection in upgradient wells
ND-non detect
mg/L-milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Waukegan Station
Waukegan, Illinois
Midwest Generation
21153.033

Chemical Name	Sample Analysis Method	Groundwater Quality Standard (mg/L) Class I*	MW-3 (mg/L) 10/25/10	MW-3 (mg/L) 3/24/11	MW-3 (mg/L) 6/13/11	MW-3 (mg/L) 9/13/11	MW-3 (mg/L) 12/6/11	MW-3 (mg/L) 3/14/12	MW-4 (mg/L) 10/25/10	MW-4 (mg/L) 3/24/11	MW-4 (mg/L) 6/13/11	MW-4 (mg/L) 9/13/11	MW-4 (mg/L) 12/6/11	MW-4 (mg/L) 3/14/12
Antimony	Metals 6020	0.006	0.0051	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0043	0.0041	0.0049	0.0077	0.0049	0.0071	0.006	0.0077	0.0059	0.0058	0.0065	0.0068
Barium	Metals 6020	2.0	0.0057	0.0086	0.018	0.0044	0.0058	0.0049	0.026	0.025	0.034	0.039	0.036	0.038
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	0.03	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	ND	0.0059	0.0044	ND	0.0054	0.0036	0.058	0.035	0.028	0.36	0.025	0.038
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Selenium	Metals 6020	0.05	0.0094	0.016	0.03	0.012	0.011	0.0064	0.0039	ND	0.022	0.025	0.015	0.0091
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	1.7	2.2	2.3	1.6	1.6	1.5	2	2.1	2	1.8	2.1	2.2
Sulfate	Dissolved 9038	400	120	130	130	97	110	140	250	170	160	160	160	280
Chloride	Dissolved 9251	200	53	49	53	49	51	52	39	47	45	59	60	71
Nitrogen/Nitrate	Nitrogen By calc	10	ND	ND	0.29	ND	ND	ND	ND	ND	0.18	0.14	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	280	350	340	300	380	340	430	400	380	470	480	490
Fluoride	Dissolved 4500 FC	4	0.27	0.47	0.39	0.24	0.67	0.64	0.6	0.84	0.97	0.67	0.82	0.73
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	ND	ND	0.29	ND	ND	ND	ND	ND	0.18	0.14	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NA - upgradient value not calculated due to non-detection in upgradient wells
ND-non detect
mg/L-milligrams per liter

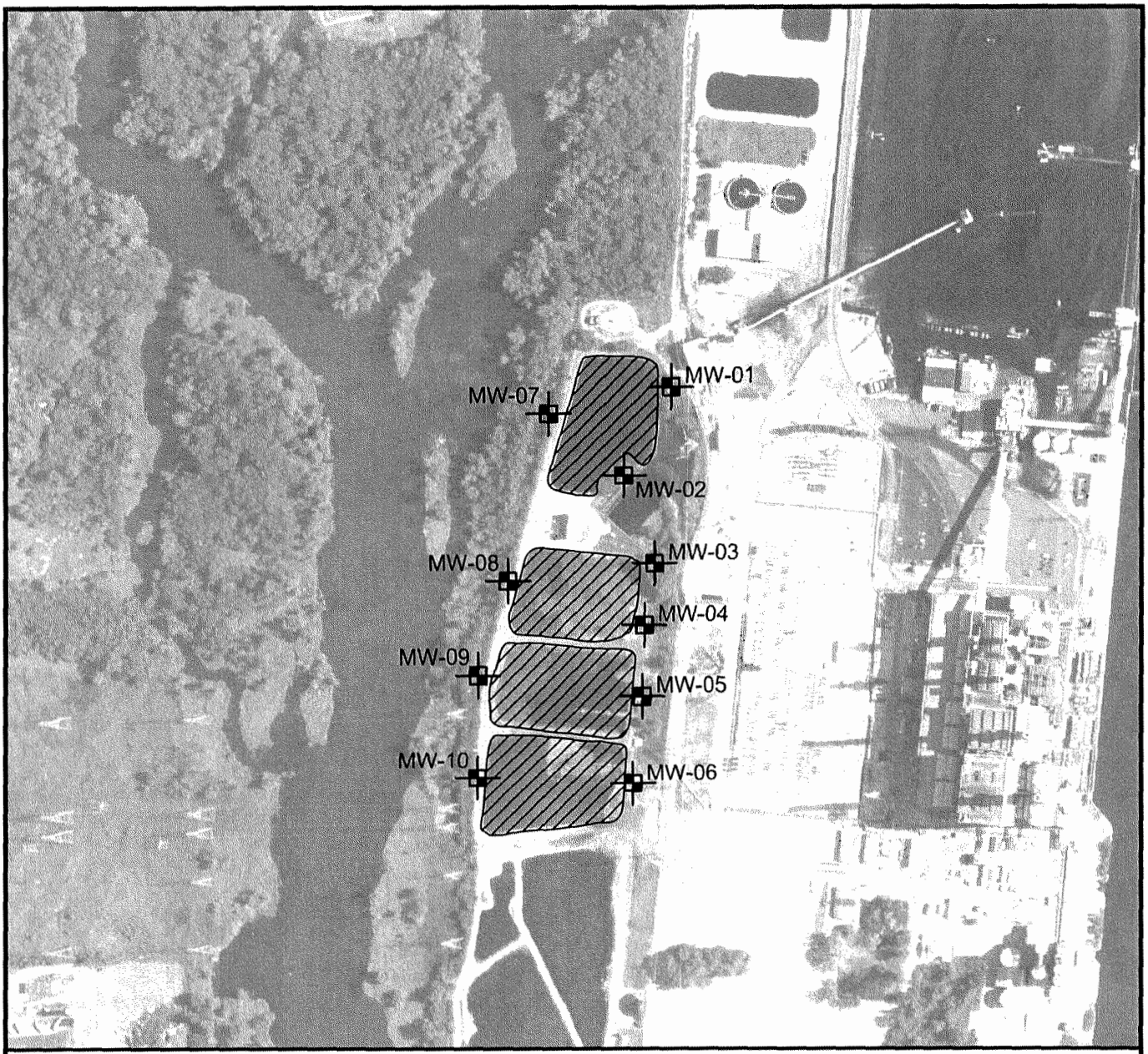
Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Waukegan Station
Waukegan, Illinois
Midwest Generation
21153.033

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)
Chemical Name		Class I*	10/25/10	3/24/11	6/13/11	9/13/11	12/6/11	3/14/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0076	0.0082	0.0013	ND	0.01	0.01
Barium	Metals 6020	2.0	0.06	0.066	0.057	0.041	0.073	0.063
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	3.5	2.8	0.95	0.42	**5.6**	**6.6**
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.71**	**0.6**	**0.28**	0.03	**0.99**	**0.76**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	ND	ND	0.0026	ND	ND	ND
Selenium	Metals 6020	0.05	0.0028	ND	0.0094	ND	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	**28**	**33**	**12**	**30**	**37**	**44**
Sulfate	Dissolved 9038	400	**920**	**780**	**1,100**	**810**	**1,100**	**980**
Chloride	Dissolved 9251	200	100	120	**540**	**220**	110	50
Nitrogen/Nitrate	Nitrogen By calc	10	ND	0.27	0.2	ND	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	**1,500**	**1,800**	**3,300**	**2,300**	**2,300**	**2,000**
Fluoride	Dissolved 4500 FC	4	0.29	0.34	0.24	0.18	0.29	0.29
Nitrogen/Nitrite	Dissolved 4500 NO2	NA	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	NA	ND	0.27	0.2	ND	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
NA - upgradient value not calculated due to non-detection in upgradient wells
ND-non detect
mg/L-milligrams per liter

EXHIBIT I: Map of groundwater monitoring wells at Will County.

Excerpted from Midwest Generation, LLC, Hydrogeologic Assessment Report – Will County Generating Station (Feb. 2011).



LEGEND

MW-01 MONITORING WELL LOCATION

N

0 600'

GRAPHIC SCALE

AERIAL IMAGE SOURCE:
LANDISCOR AERIAL INFORMATION INC., JULY 2008

Date: FEB. 2011	FIGURE 3 MONITORING WELL LOCATION PLAN	PATRICK ENGINEERING INC. 4970 Varsity Drive Lisle, Illinois 60532-4101 TEL. (630) 795-7200 FAX (630) 724-1681 PROFESSIONAL DESIGN FIRM LICENSE NO. 184-000409
Proj No.: 21053.070	**WILL COUNTY STATION** **ROMEOVILLE, ILLINOIS**	
App. By: RMF		

EXHIBIT J: Groundwater monitoring data summary for Will County.

Excerpted from Midwest Generation, LLC, Quarterly Groundwater Monitoring Results – First Quarter 2012 – Amended – Revisions to Original Report Submitted May 11, 2012 – Will County Generating Station – Ash Impoundments (July 30, 2012).

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Will County Station
Romeoville, Illinois
Midwest Generation
21253.028

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-1 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)	MW-2 (mg/L)
Chemical Name		Class I*	12/13/10	3/28/11	6/15/11	9/15/11	12/8/11	3/16/12	12/13/10	3/28/11	6/15/11	9/15/11	12/8/11	3/16/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	0.0063	ND	ND	ND	ND	0.0073	0.017	ND
Arsenic	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	0.0052	0.0032	ND	0.008	0.0058	0.0048
Barium	Metals 6020	2.0	0.05	0.041	0.046	0.038	0.033	0.033	0.061	0.068	0.068	0.048	0.048	0.058
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	0.0011	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	0.11	0.11	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.2**	0.15	**0.22**	**0.16**	**0.17**	**0.16**	0.032	0.032	0.043	0.036	0.031	0.031
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0046	0.0038	ND	0.0029	0.004	0.0042	ND	ND	ND	ND	ND	ND
Selenium	Metals 6020	0.05	ND	ND	ND	0.0053	0.0025	0.0033	ND	ND	ND	ND	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	1.8	1.6	1.8	1.7	1.6	1.5	1.8	1.7	**2.3**	**2.3**	1.7	1.7
Sulfate	Dissolved 9038	400	**530**	390	280	320	270	**430**	**430**	280	400	330	220	330
Chloride	Dissolved 9251	200	110	**210**	110	120	140	190	110	**250**	180	110	120	140
Nitrogen/Nitrate	Nitrogen By calc	10	ND	1.1	0.73	0.33	1.4	2.2	ND	ND	ND	ND	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	1,100	1,100	1,100	760	770	910	870	970	900	720	650	810
Fluoride	Dissolved 4500 FC	4	0.71	0.65	0.53	0.77	0.73	0.69	0.62	0.5	0.42	0.59	0.59	0.46
Nitrogen/Nitrite	Dissolved 4500 NO2	--	ND	ND	ND	0.042	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	--	ND	1.1	0.73	0.37	1.4	2.2	ND	ND	ND	ND	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Will County Station
Romeoville, Illinois
Midwest Generation
21253.028

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-3 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)	MW-4 (mg/L)
Chemical Name		Class I*	12/13/10	3/28/11	6/15/11	9/15/11	12/8/11	3/16/12	12/13/10	3/29/11	6/15/11	9/15/11	12/8/11	3/16/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.002	0.0024	ND	0.0025	0.0018	0.0017	0.0027	0.0016	ND	0.0041	0.0016	0.0015
Barium	Metals 6020	2.0	0.084	0.086	0.071	0.079	0.083	0.075	0.068	0.062	0.05	0.05	0.043	0.036
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	0.0022	ND	ND	ND	ND	0.0011	ND	ND	0.0012	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	0.37	0.57	ND	0.26	0.19	0.2	0.83	0.78	0.7	1.2	0.64	0.53
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	**0.34**	**0.31**	**0.34**	**0.26**	**0.29**	**0.27**	**0.52**	**0.58**	**0.7**	**1.0**	**0.62**	**0.6**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0054	0.0037	ND	0.0061	0.0053	0.0052	0.0048	0.0041	ND	0.0051	0.0047	0.0048
Selenium	Metals 6020	0.05	ND	ND	ND	0.0033	ND	ND	ND	0.0033	ND	ND	0.0086	0.0067
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	**2.7**	**2.4**	**2.6**	**3.3**	**2.8**	**2.7**	**3.7**	**3.3**	**3.6**	**4.3**	**3.0**	**4.0**
Sulfate	Dissolved 9038	400	330	270	240	250	280	320	**1,500**	**1,500**	**1,600**	**4,800**	**1,600**	**2,000**
Chloride	Dissolved 9251	200	54	**250**	100	130	100	95	120	190	120	170	150	150
Nitrogen/Nitrate	Nitrogen By calc	10	ND	ND	0.81	ND	0.54	ND	ND	ND	0.19	ND	0.37	0.45
Total Dissolved Solids	Dissolved 2540C	1,200	940	1,000	990	1,000	930	1,000	**2,500**	**2,600**	**2,800**	**6,000**	**3,100**	**3,700**
Fluoride	Dissolved 4500 FC	4	0.5	0.37	0.36	0.45	0.39	0.38	0.52	0.49	0.48	0.53	0.55	0.5
Nitrogen/Nitrite	Dissolved 4500 NO2	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	--	ND	ND	0.81	ND	0.54	ND	ND	ND	0.19	ND	0.37	0.45

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Will County Station
Romeoville, Illinois
Midwest Generation
21253.028

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-5 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)	MW-6 (mg/L)
		Class I*	12/13/10	3/29/11	6/15/11	9/15/11	12/8/11	3/16/12	12/13/10	3/28/11	6/15/11	9/15/11	12/8/11	3/16/12
Chemical Name														
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0066	0.0048	ND	0.0025	0.0065	0.0065	0.0018	0.0018	ND	0.0031	0.0022	0.0022
Barium	Metals 6020	2.0	0.051	0.06	0.067	0.07	0.061	0.053	0.05	0.04	0.045	0.041	0.053	0.044
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	0.0079	0.0067	0.055	0.13	0.038	0.032	0.073	0.051	0.047	0.024	0.038	0.029
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	ND	ND	ND	0.0021	ND	ND	ND	ND	ND	ND	ND	ND
Selenium	Metals 6020	0.05	0.017	0.014	0.016	0.008	0.01	0.0059	0.0062	0.0028	ND	0.011	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	**2.6**	**2.7**	**3.2**	**4.0**	**3.2**	**2.9**	**2.7**	**2.5**	**2.4**	**3.0**	**2.5**	**2.5**
Sulfate	Dissolved 9038	400	**580**	**570**	**540**	**690**	**500**	370	**500**	**540**	**570**	**420**	**440**	380
Chloride	Dissolved 9251	200	110	150	140	150	130	170	120	**210**	150	120	120	110
Nitrogen/Nitrate	Nitrogen By calc	10	0.27	1.6	0.97	0.11	1	0.11	ND	ND	0.1	ND	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	1,000	**1,300**	**1,400**	**1,500**	1,000	1,000	990	1,100	1,200	870	880	900
Fluoride	Dissolved 4500 FC	4	0.41	0.4	0.46	0.49	0.38	0.42	0.85	0.88	0.79	0.97	0.77	0.68
Nitrogen/Nitrite	Dissolved 4500 NO2	--	ND	0.31	0.13	ND	0.17	0.14	ND	0.048	0.16	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	--	0.27	1.9	1.1	0.11	1.2	0.25	ND	ND	0.26	ND	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Will County Station
Romeoville, Illinois
Midwest Generation
21253.028

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-7 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)	MW-8 (mg/L)
		Class I*	12/13/10	3/29/11	6/15/11	9/15/11	12/8/11	3/16/12	12/13/10	3/29/11	6/15/11	9/15/11	12/8/11	3/16/12
Chemical Name														
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.004	0.0037	ND	0.0042	0.0042	0.0041	0.0067	0.0059	0.0082	0.014	0.012	0.0066
Barium	Metals 6020	2.0	0.045	0.067	0.076	0.082	0.082	0.069	0.069	0.089	0.085	0.099	0.078	0.066
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	0.016	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	Metals 6020	5.0	0.23	0.18	ND	0.37	0.5	0.57	0.48	0.38	0.76	0.46	0.68	ND
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	0.12	0.11	0.15	**0.18**	**0.2**	**0.2**	**0.33**	**0.44**	**0.47**	**0.45**	**0.4**	ND
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	0.0029	0.0023	ND	0.0024	0.0021	ND	ND	ND	ND	0.0034	0.002	ND
Selenium	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	**4.7**	**5.0**	**5.7**	**3.4**	**5.0**	**5.1**	1.7	1.3	1.7	**2.3**	1.9	1.5
Sulfate	Dissolved 9038	400	**610**	**650**	**1,000**	**710**	**710**	**770**	**440**	**440**	**420**	**600**	330	330
Chloride	Dissolved 9251	200	160	140	140	160	150	130	93	**270**	200	160	130	160
Nitrogen/Nitrate	Nitrogen By calc	10	ND	ND	ND	ND	ND	ND	ND	0.22	ND	ND	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	**1,300**	**1,500**	**1,600**	**1,400**	**1,300**	**1,400**	930	1,200	1,100	**1,300**	980	910
Fluoride	Dissolved 4500 FC	4	0.96	0.77	0.71	0.82	0.86	0.76	0.61	0.55	0.57	0.64	0.61	0.52
Nitrogen/Nitrite	Dissolved 4500 NO2	--	ND	0.077	0.035	0.05	0.043	ND	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	--	ND	ND	ND	ND	ND	ND	ND	0.22	ND	ND	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND- non detect
mg/L- milligrams per liter

Table 3
GROUNDWATER ANALYTICAL RESULTS - AMENDED JULY 2012
Will County Station
Romeoville, Illinois
Midwest Generation
21253.028

PATRICK ENGINEERING	Sample Analysis Method	Groundwater Quality Standard (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-9 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)	MW-10 (mg/L)
Chemical Name		Class I*	12/13/10	3/29/11	6/15/11	9/15/11	12/8/11	3/16/12	12/13/10	3/28/11	6/15/11	9/15/11	12/8/11	3/16/12
Antimony	Metals 6020	0.006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic	Metals 6020	0.05	0.0059	0.0049	0.0052	0.0065	0.0078	0.0053	0.0041	0.0046	ND	0.0088	0.0083	0.0056
Barium	Metals 6020	2.0	0.025	0.031	0.025	0.023	0.017	0.023	0.098	0.091	0.091	0.11	0.11	0.1
Beryllium	Metals 6020	0.004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	Metals 6020	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cobalt	Metals 6020	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	Metals 6020	0.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyanide	Dissolved 9014	0.2	ND	ND	ND	ND	ND	ND	ND	ND	0.01	ND	ND	ND
Iron	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	0.32	0.46	0.63	0.6	0.71	0.61
Lead	Metals 6020	0.0075	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Manganese	Metals 6020	0.15	ND	ND	ND	ND	ND	ND	**0.25**	**0.22**	**0.25**	**0.27**	**0.29**	**0.25**
Mercury	Mercury 7470A	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	Metals 6020	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Selenium	Metals 6020	0.05	0.0036	0.0042	ND	0.0045	0.0031	ND	ND	ND	ND	0.0032	ND	ND
Silver	Metals 6020	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	Metals 6020	0.002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc	Metals 6020	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Boron	Metals 6020	2	2.2	1.4	1.7	2.0	1.9	1.4	**2.1**	1.8	**2.2**	**2.8**	**2.5**	**2.1**
Sulfate	Dissolved 9038	400	**410**	320	**410**	400	270	340	370	370	350	**420**	290	330
Chloride	Dissolved 9251	200	100	**280**	**230**	190	140	200	92	130	150	120	120	100
Nitrogen/Nitrate	Nitrogen By calc	10	ND	2.4	0.94	ND	1.9	3.2	ND	ND	ND	ND	ND	ND
Total Dissolved Solids	Dissolved 2540C	1,200	800	1,000	940	850	660	820	990	960	990	1,000	1,100	990
Fluoride	Dissolved 4500 FC	4	0.33	0.36	0.28	0.28	0.38	0.39	0.66	0.64	0.65	0.67	0.59	0.52
Nitrogen/Nitrite	Dissolved 4500 NO2	--	0.44	1.2	0.16	0.22	0.15	0.12	ND	ND	ND	ND	ND	ND
Nitrogen/Nitrate/Nitrite	Dissolved 4500 NO3	--	ND	3.6	1.1	0.18	2.0	3.3	ND	ND	ND	ND	ND	ND

Notes:
*Class I Groundwater Standards from 35 IAC Part 620
Bold values show exceedences of 35 IAC Part 620
ND- non detect
mg/L- milligrams per liter

EXHIBIT K: IEPA Violation Notice for Joliet 29.

Letter from Michael Crumly, Illinois EPA, to Basil G. Constantelos, Midwest Generation (June 11, 2012) (transmitting Violation Notice for Joliet #29 Generating Station, Violation Notice No. W-2012-00059).

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-0561

June 11, 2012

CERTIFIED MAIL # 7010 2780 0002 1163 7223
RETURN RECEIPT REQUESTED

Mr. Basil G. Constantelos: Managing Director, Environmental Services
Midwest Generation EME, LLC
2535 Remington Blvd
Suite A
Bolingbrook, IL 60440

Re: Violation Notice: Midwest Generation, LLC, Joliet #29 Generating Station
Identification No.: 6284
Violation Notice No.: W-2012-00059

Dear Mr. Constantelos:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

ID: 6284 Midwest Generation, LLC, Joliet #29 Generating Station
VN W-2012-00059

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Public Water Supplies
Attn: Andrea Rhodes, CAS #19
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, W-2012-00059.

Questions regarding this Violation Notice should be directed to Andrea Rhodes at 217/785-0561.

Sincerely,

Michael Crumly
Manager, Compliance Assurance Section
Division of Public Water Supplies
Bureau of Water

Attachments

cc: Maria Race

CASE ID: 2012-006

ATTACHMENT A

MIDWEST GENERATION, LLC, JOLIET #29 GENERATING STATION, ID:6284
VIOLATION NOTICE NO. W-2012-00059:

A review of information available to the Illinois EPA indicates the following on-going violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation.

Groundwater Quality

No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or an existing or potential use of such groundwater is precluded. No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard to be exceeded. Midwest Generation, LLC must take actions to mitigate existing contamination and prevent the continuing release of contaminants into the environment.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-2 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	230 mg/l	200 mg/l	06/14/2011
Antimony	0.012 mg/l	0.006 mg/l	12/06/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-3 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	250 mg/l	200 mg/l	03/15/2012
Chloride	260 mg/l	200 mg/l	12/07/2011
Chloride	300 mg/l	200 mg/l	06/14/2011
Chloride	240 mg/l	200 mg/l	03/28/2011
Chloride	260 mg/l	200 mg/l	12/07/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, JOLIET #29 GENERATING STATION, ID:6284
VIOLATION NOTICE NO. W-2012-00059:

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-4 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	210 mg/l	200 mg/l	03/15/2012
Chloride	250 mg/l	200 mg/l	06/14/2011
Chloride	270 mg/l	200 mg/l	03/28/2011
Chloride	270 mg/l	200 mg/l	12/07/2010
Manganese	0.33 mg/l	0.15 mg/l	12/07/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-5 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	210 mg/l	200 mg/l	03/15/2012
Chloride	220 mg/l	200 mg/l	06/14/2011
Chloride	240 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-6 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	270 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, JOLIET #29 GENERATING STATION, ID:6284
VIOLATION NOTICE NO. W-2012-00059:

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-7 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	320 mg/l	200 mg/l	03/28/2011
Chloride	430 mg/l	200 mg/l	12/06/2010
Manganese	0.29 mg/l	0.15 mg/l	12/07/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-8 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	410 mg/l	200 mg/l	03/15/2012
Chloride	350 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-9 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	290 mg/l	200 mg/l	06/14/2011
Iron	7.3 mg/l	5.0 mg/l	06/14/2011
Manganese	1.3 mg/l	0.15 mg/l	03/15/2012
Manganese	0.66 mg/l	0.15 mg/l	12/07/2011
Manganese	0.82 mg/l	0.15 mg/l	09/14/2011
Manganese	0.95 mg/l	0.15 mg/l	06/14/2011
Manganese	1.6 mg/l	0.15 mg/l	03/28/2011
Manganese	1.1 mg/l	0.15 mg/l	12/06/2010
Sulfate	1,600 mg/l	400 mg/l	03/15/2012
Sulfate	1,600 mg/l	400 mg/l	12/07/2011
Sulfate	750 mg/l	400 mg/l	09/14/2011
Sulfate	580 mg/l	400 mg/l	06/14/2011

ATTACHMENT A

MIDWEST GENERATION, LLC, JOLIET #29 GENERATING STATION, ID:6284
VIOLATION NOTICE NO. W-2012-00059:

Violation
Description
MW-9 continued

Parameter	Sample Value	GW Standard	Collection Date
Sulfate	1,100 mg/l	400 mg/l	03/28/2011
Sulfate	1,600 mg/l	400 mg/l	12/06/2010
TDS	2,600 mg/l	1,200 mg/l	03/15/2012
TDS	2,400 mg/l	1,200 mg/l	12/07/2011
TDS	1,700 mg/l	1,200 mg/l	09/14/2011
TDS	1,500 mg/l	1,200 mg/l	06/14/2011
TDS	2,400 mg/l	1,200 mg/l	03/28/2011
TDS	2,600 mg/l	1,200 mg/l	12/06/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-10 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	300 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-11 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Boron	2.2 mg/l	2.0 mg/l	06/14/2011
Boron	2.6 mg/l	2.0 mg/l	03/28/2011
Chloride	240 mg/l	200 mg/l	03/15/2012
Chloride	280 mg/l	200 mg/l	06/14/2011
Chloride	270 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Water System Name Joliet #29

W-20 12 - 00059

DW Distribution List and/or bccs

X	VN Central File (Bev)		02 File		Marcia Willhite		Geoff Andres
	Mike Crumly		Dianne Potter		Jeri Long	X	Andrea Rhodes
	Paul Connelly		Allison Ristau		Mary Reed		Jewel Brant
	Sharon Dowson						
	Dave McMillan	X	Rick Cobb		Jerry Kuhn		
	Springfield FOS		Champaign FOS		Collinsville FOS		Elgin FOS
	Rockford FOS		Marion FOS				
X	Connie Tonsor		DLC File		Chuck Gunnarson	X	Chad Kruse
X	Jason Boltz		John Kim		Joey Logan-Wilkey	X	Tom Reuter

Meeting/Response Due Date

Agency Response Due:		Meeting Due:	

Approvals (when Applicable)

Dave McMillan Approval On _____	Jerry Kuhn Approval On _____
Marcia Willhite Approval On _____	John Kim Approval On _____

cc: Addresses (if not already provided on merge)

SPECIAL INSTRUCTIONS: _____

Correspondence Route Slip

Initiated By GW	CAS Contact Andrea Rhodes
Mail Out DUE Date	Today's Date 6-4-11
Peer Review Completed On Mary Reed	Peer Reviewer
Supervisor Review Initials SRH 6/11/12	

EXHIBIT L: IEPA Violation Notice for Powerton.

Letter from Michael Crumly, Illinois EPA, to Basil G. Constantelos, Midwest Generation (June 11, 2012) (transmitting Violation Notice for Powerton Generating Station, Violation Notice No. W-2012-00057).

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-0561

June 11, 2012

CERTIFIED MAIL # 7010 2780 0002 1163 7254
RETURN RECEIPT REQUESTED

Mr. Basil G. Constantelos: Managing Director, Environmental Services
Midwest Generation EME, LLC
2535 Remington Blvd
Suite A
Bolingbrook, IL 60440

Re: Violation Notice: Midwest Generation, LLC, Powerton Generating Station
Identification No.: 6282
Violation Notice No.: W-2012-00057

Dear Mr. Constantelos:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Public Water Supplies
Attn: Andrea Rhodes, CAS #19
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, W-2012-00057.

Questions regarding this Violation Notice should be directed to Andrea Rhodes at 217/785-0561.

Sincerely,

Michael Crumly
Manager, Compliance Assurance Section
Division of Public Water Supplies
Bureau of Water

Attachments

cc: Maria Race

CASE ID: 2012-006

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

A review of information available to the Illinois EPA indicates the following on-going violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation.

Groundwater Quality

No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or an existing or potential use of such groundwater is precluded. No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard to be exceeded. Midwest Generation, LLC must take actions to mitigate existing contamination and prevent the continuing release of contaminants into the environment.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-1 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.39 su	6.5-9.0 su	12/12/2011
Boron	2.9 mg/l	2.0 mg/l	3/19/2012
Nitrate	11 mg/l	10.0 mg/l	9/20/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-2 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.41 su	6.5-9.0 su	12/12/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

A review of information available to the Illinois EPA indicates the following on-going violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Groundwater Quality

No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or an existing or potential use of such groundwater is precluded. No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard to be exceeded. Midwest Generation, LLC must take actions to mitigate existing contamination and prevent the continuing release of contaminants into the environment.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-1 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.39 su	6.5-9.0 su	12/12/2011
Boron	2.9 mg/l	2.0 mg/l	3/19/2012
Nitrate	11 mg/l	10.0 mg/l	9/20/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-2 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.41 su	6.5-9.0 su	12/12/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-4 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.37 su	6.5-9.0 su	12/12/2011
Manganese	0.35 mg/l	0.15 mg/l	12/12/2011
Manganese	0.69 mg/l	0.15 mg/l	9/20/2011
Manganese	0.41 mg/l	0.15 mg/l	6/16/2011
Manganese	0.68 mg/l	0.15 mg/l	3/25/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-5 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.34 su	6.5-9.0 su	12/12/2011
Manganese	0.26 mg/l	0.15 mg/l	3/19/2012
Manganese	0.50 mg/l	0.15 mg/l	12/12/2011
Manganese	0.64 mg/l	0.15 mg/l	9/20/2011
Manganese	0.48 mg/l	0.15 mg/l	6/16/2011
Manganese	0.49 mg/l	0.15 mg/l	3/25/2011
Manganese	0.51 mg/l	0.15 mg/l	12/15/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-6 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	0.61 mg/l	0.15 mg/l	3/19/2012
Manganese	0.63 mg/l	0.15 mg/l	12/12/2011
Manganese	0.66 mg/l	0.15 mg/l	9/20/2011
Manganese	0.63 mg/l	0.15 mg/l	6/16/2011
Manganese	0.68 mg/l	0.15 mg/l	3/25/2011
Manganese	0.68 mg/l	0.15 mg/l	12/15/2010

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
MW-6 continued

Parameter	Sample Value	GW Standard	Collection Date
Chloride	210 mg/l	200 mg/l	9/20/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-7 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.45 su	6.5-9.0 su	12/12/2011
Arsenic	0.23 mg/l	0.05 mg/l	3/19/2012
Arsenic	0.23 mg/l	0.05 mg/l	12/12/2011
Arsenic	0.18 mg/l	0.05 mg/l	9/20/2011
Arsenic	0.12 mg/l	0.05 mg/l	6/16/2011
Arsenic	0.085 mg/l	0.05 mg/l	3/25/2011
Iron	31 mg/l	5.0 mg/l	3/19/2012
Iron	26 mg/l	5.0 mg/l	12/12/2011
Iron	22 mg/l	5.0 mg/l	9/20/2011
Iron	10 mg/l	5.0 mg/l	6/16/2011
Iron	7.5 mg/l	5.0 mg/l	3/25/2011
Iron	8.0 mg/l	5.0 mg/l	12/15/2010
Lead	0.039 mg/l	0.0075 mg/l	12/15/2010
Manganese	11 mg/l	0.15 mg/l	3/19/2012
Manganese	12 mg/l	0.15 mg/l	12/12/2011
Manganese	12 mg/l	0.15 mg/l	9/20/2011
Manganese	6.4 mg/l	0.15 mg/l	6/16/2011
Manganese	5.9 mg/l	0.15 mg/l	3/25/2011
Manganese	3.5 mg/l	0.15 mg/l	12/15/2010
Selenium	0.054 mg/l	0.05 mg/l	12/12/2011
TDS	1,400 mg/l	1,200 mg/l	3/19/2012
TDS	1,300 mg/l	1,200 mg/l	12/12/2011
TDS	1,300 mg/l	1,200 mg/l	9/20/2011
TDS	1,300 mg/l	1,200 mg/l	6/16/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-8 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	0.27 mg/l	0.15 mg/l	3/19/2012
Manganese	0.20 mg/l	0.15 mg/l	12/12/2011
Manganese	0.18 mg/l	0.15 mg/l	9/20/2011
Manganese	0.29 mg/l	0.15 mg/l	6/16/2011
Manganese	0.27 mg/l	0.15 mg/l	3/25/2011
Chloride	210 mg/l	200 mg/l	9/20/2011
Chloride	210 mg/l	200 mg/l	3/25/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-9 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.31 su	6.5-9.0 su	12/12/2011
Manganese	0.22 mg/l	0.15 mg/l	3/19/2012
Manganese	0.28 mg/l	0.15 mg/l	12/12/2011
Manganese	0.48 mg/l	0.15 mg/l	6/16/2011
Manganese	0.45 mg/l	0.15 mg/l	3/25/2011
Manganese	0.43 mg/l	0.15 mg/l	2/15/2011
Manganese	0.23 mg/l	0.15 mg/l	12/16/2010
Manganese	0.19 mg/l	0.15 mg/l	12/15/2010
Selenium	0.072 mg/l	0.05 mg/l	3/25/2011
Boron	2.6 mg/l	2.0 mg/l	3/19/2012
Boron	2.7 mg/l	2.0 mg/l	12/12/2011
Boron	2.5 mg/l	2.0 mg/l	9/20/2011
Boron	2.5 mg/l	2.0 mg/l	9/19/2011
Boron	2.1 mg/l	2.0 mg/l	12/16/2010
Boron	2.2 mg/l	2.0 mg/l	12/15/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-10 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.03 su	6.5-9.0 su	12/12/2011
Manganese	2.3 mg/l	0.15 mg/l	3/19/2012
Manganese	2.3 mg/l	0.15 mg/l	12/12/2011
Manganese	2.3 mg/l	0.15 mg/l	9/20/2011
Manganese	3.8 mg/l	0.15 mg/l	6/16/2011
Manganese	2.8 mg/l	0.15 mg/l	3/25/2011
Manganese	2.1 mg/l	0.15 mg/l	12/15/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-11 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.48 su	6.5-9.0 su	12/12/2011
Manganese	2.9 mg/l	0.15 mg/l	3/19/2012
Manganese	2.5 mg/l	0.15 mg/l	12/12/2011
Manganese	2.9 mg/l	0.15 mg/l	9/19/2011
Manganese	2.2 mg/l	0.15 mg/l	6/16/2011
Manganese	3.6 mg/l	0.15 mg/l	2/15/2011
Manganese	3.2 mg/l	0.15 mg/l	12/16/2010
Boron	2.3 mg/l	2.0 mg/l	3/19/2012

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-12 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Iron	5.6 mg/l	5.0 mg/l	6/16/2011
Iron	6.3 mg/l	5.0 mg/l	2/15/2011
Iron	5.5 mg/l	5.0 mg/l	12/15/2010

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
MW-12 Continued:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	0.25 mg/l	0.15 mg/l	12/12/2011
Manganese	0.37 mg/l	0.15 mg/l	9/19/2011
Manganese	0.26 mg/l	0.15 mg/l	6/16/2011
Manganese	0.58 mg/l	0.15 mg/l	2/15/2011
Manganese	0.32 mg/l	0.15 mg/l	12/15/2010
Mercury	0.0096 mg/l	0.002 mg/l	12/15/2010
Chloride	210 mg/l	200 mg/l	12/12/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-13 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	3.5 mg/l	0.15 mg/l	4/10/2012
Manganese	3.5 mg/l	0.15 mg/l	12/12/2011
Manganese	3.6 mg/l	0.15 mg/l	10/13/2011
Manganese	2.6 mg/l	0.15 mg/l	8/9/2011
Manganese	2.9 mg/l	0.15 mg/l	6/16/2011
Manganese	2.7 mg/l	0.15 mg/l	4/25/2011
Manganese	3.8 mg/l	0.15 mg/l	2/15/2011
Manganese	5.0 mg/l	0.15 mg/l	12/15/2010
Selenium	0.056 mg/l	0.05 mg/l	8/9/2011
Boron	4.0 mg/l	2.0 mg/l	4/10/2012
Boron	4.1 mg/l	2.0 mg/l	12/12/2011
Boron	3.0 mg/l	2.0 mg/l	10/13/2011
Boron	2.7 mg/l	2.0 mg/l	8/9/2011
Boron	3.0 mg/l	2.0 mg/l	6/16/2011
Boron	2.6 mg/l	2.0 mg/l	4/25/2011
Boron	3.1 mg/l	2.0 mg/l	2/15/2011
Boron	3.9 mg/l	2.0 mg/l	12/15/2010
Sulfate	1,100 mg/l	400 mg/l	4/10/2012
Sulfate	1,100 mg/l	400 mg/l	12/12/2011
Sulfate	660 mg/l	400 mg/l	10/13/2011
Sulfate	440 mg/l	400 mg/l	8/9/2011
Sulfate	540 mg/l	400 mg/l	6/16/2011
Sulfate	580 mg/l	400 mg/l	4/25/2011
Sulfate	770 mg/l	400 mg/l	2/15/2011
Sulfate	1,400 mg/l	400 mg/l	12/15/2010

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
MW-13 continued:

Parameter	Sample Value	GW Standard	Collection Date
Sulfate	580 mg/l	400 mg/l	4/25/2011
Sulfate	770 mg/l	400 mg/l	2/15/2011
Sulfate	1,400 mg/l	400 mg/l	12/15/2010
TDS	2,300 mg/l	1,200 mg/l	4/10/2012
TDS	2,100 mg/l	1,200 mg/l	12/12/2011
TDS	1,500 mg/l	1,200 mg/l	10/13/2011
TDS	1,300 mg/l	1,200 mg/l	6/16/2011
TDS	1,400 mg/l	1,200 mg/l	4/25/2011
TDS	1,600 mg/l	1,200 mg/l	2/15/2011
TDS	2,600 mg/l	1,200 mg/l	12/15/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-14 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	6.05 su	6.5-9.0 su	12/12/2011
Manganese	0.63 mg/l	0.15 mg/l	4/10/2012
Manganese	0.84 mg/l	0.15 mg/l	10/13/2011
Manganese	0.57 mg/l	0.15 mg/l	8/9/2011
Manganese	0.36 mg/l	0.15 mg/l	6/16/2011
Manganese	0.29 mg/l	0.15 mg/l	4/25/2011
Manganese	0.81 mg/l	0.15 mg/l	2/15/2011
Manganese	0.68 mg/l	0.15 mg/l	12/15/2010
Selenium	0.065 mg/l	0.05 mg/l	4/25/2011
Thallium	0.0034 mg/l	0.002 mg/l	4/10/2012
Thallium	0.0027 mg/l	0.002 mg/l	8/9/2011
Thallium	0.0039 mg/l	0.002 mg/l	6/16/2011
Thallium	0.0035 mg/l	0.002 mg/l	4/25/2011
Sulfate	990 mg/l	400 mg/l	4/10/2012
Sulfate	880 mg/l	400 mg/l	12/12/2011
Sulfate	850 mg/l	400 mg/l	10/13/2011
Sulfate	940 mg/l	400 mg/l	8/9/2011
Sulfate	810 mg/l	400 mg/l	6/16/2011
Sulfate	770 mg/l	400 mg/l	4/25/2011
Sulfate	820 mg/l	400 mg/l	2/15/2011
Sulfate	960 mg/l	400 mg/l	12/15/2010

ATTACHMENT A

MIDWEST GENERATION, LLC, POWERTON GENERATING STATION, ID:6282
VIOLATION NOTICE NO. W-2012-00057:

Violation
Description
MW-14 continued:

Parameter	Sample Value	GW Standard	Collection Date
Chloride	240 mg/l	200 mg/l	8/9/2011
TDS	2,200 mg/l	1,200 mg/l	4/10/2012
TDS	1,800 mg/l	1,200 mg/l	12/12/2011
TDS	1,800 mg/l	1,200 mg/l	10/13/2011
TDS	2,000 mg/l	1,200 mg/l	8/9/2011
TDS	1,900 mg/l	1,200 mg/l	6/16/2011
TDS	1,800 mg/l	1,200 mg/l	4/25/2011
TDS	1,700 mg/l	1,200 mg/l	2/15/2011
TDS	1,800 mg/l	1,200 mg/l	12/15/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-15 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	0.25 mg/l	0.15 mg/l	4/10/2012
Manganese	0.39 mg/l	0.15 mg/l	12/12/2011
Manganese	0.48 mg/l	0.15 mg/l	10/13/2011
Manganese	0.37 mg/l	0.15 mg/l	8/9/2011
Manganese	0.60 mg/l	0.15 mg/l	6/16/2011
Manganese	0.36 mg/l	0.15 mg/l	4/25/2011
Manganese	0.42 mg/l	0.15 mg/l	2/15/2011
Manganese	0.56 mg/l	0.15 mg/l	12/15/2010
Sulfate	650 mg/l	400 mg/l	6/16/2011
Chloride	210 mg/l	200 mg/l	8/9/2011
TDS	1,600 mg/l	1,200 mg/l	6/16/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Water System Name Power Ton

W-20 12 - 00057

DW Distribution List and/or bccs

X	VN Central File (Bev)		02 File		Marcia Willhite		Geoff Andres
	Mike Crumly		Dianne Potter		Jeri Long	X	Andrea Rhodes
	Paul Connelly		Allison Ristau		Mary Reed		Jewel Brant
	Sharon Dowson						
	Dave McMillan		Rick Cobb		Jerry Kuhn		
	Springfield FOS		Champaign FOS		Collinsville FOS		Elgin FOS
	Rockford FOS		Marion FOS				
X	Connie Tonsor		DLC File		Chuck Gunnarson	X	Chad Kruse
	Jason Boltz		John Kim		Joey Logan-Wilkey	X	Tom Reuter

Meeting/Response Due Date

Agency Response Due:		Meeting Due:	

Approvals (when Applicable)

Dave McMillan Approval On _____	Jerry Kuhn Approval On _____
Marcia Willhite Approval On _____	John Kim Approval On _____

cc: Addresses (if not already provided on merge)

_____	_____	_____
_____	_____	_____
_____	_____	_____

SPECIAL INSTRUCTIONS: _____

Correspondence Route Slip

Initiated By GW	CAS Contact Andrea Rhodes
Mail Out DUE Date	Today's Date 6-4-12
Peer Review Completed On 6-4-12	Peer Reviewer Mary Reed
Supervisor Review Initials SRH 6/11/12	

EXHIBIT M: IEPA Violation Notice for Waukegan.

Letter from Michael Crumly, Illinois EPA, to Basil G. Constantelos, Midwest Generation (June 11, 2012) (transmitting Violation Notice for Waukegan Generating Station, Violation Notice No. W-2012-00056).

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-0561

June 11, 2012

CERTIFIED MAIL # 7010 2780 0002 1163 7216
RETURN RECEIPT REQUESTED

Mr. Basil G. Constantelos: Managing Director, Environmental Services
Midwest Generation EME, LLC
2535 Remington Blvd
Suite A
Bolingbrook, IL 60440

Re: Violation Notice: Midwest Generation, LLC, Waukegan Generating Station
Identification No.: 6281
Violation Notice No.: W-2012-00056

Dear Mr. Constantelos:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Public Water Supplies
Attn: Andrea Rhodes, CAS #19
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, W-2012-00056.

Questions regarding this Violation Notice should be directed to Andrea Rhodes at 217/785-0561.

Sincerely,

Michael Crumly
Manager, Compliance Assurance Section
Division of Public Water Supplies
Bureau of Water

Attachments

cc: Maria Race

CASE ID: 2012-006

ATTACHMENT A

MIDWEST GENERATION, LLC, WAUKEGAN GENERATING STATION, ID:6281
VIOLATION NOTICE NO. W-2012-00056:

A review of information available to the Illinois EPA indicates the following on-going violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation.

Groundwater Quality

No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or an existing or potential use of such groundwater is precluded. No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard to be exceeded. Midwest Generation, LLC must take actions to mitigate existing contamination and prevent the continuing release of contaminants into the environment.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-1 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	9.54 su	6.5-9.0 su	3/14/2012
pH	9.97 su	6.5-9.0 su	6/13/2011
pH	9.92 su	6.5-9.0 su	3/24/2011
Antimony	0.052 mg/l	0.006 mg/l	10/25/2010
Arsenic	0.078 mg/l	0.05 mg/l	3/14/2012
Arsenic	0.057 mg/l	0.05 mg/l	12/6/2011
Arsenic	0.077 mg/l	0.05 mg/l	9/13/2011
Arsenic	0.17 mg/l	0.05 mg/l	6/13/2011
Arsenic	0.054 mg/l	0.05 mg/l	10/25/2010
Boron	2.5 mg/l	2.0 mg/l	3/14/2012
Boron	2.8 mg/l	2.0 mg/l	12/6/2011
Boron	2.5 mg/l	2.0 mg/l	9/13/2011
Boron	2.6 mg/l	2.0 mg/l	6/13/2011
Boron	2.6 mg/l	2.0 mg/l	10/25/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, WAUKEGAN GENERATING STATION, ID:6281
VIOLATION NOTICE NO. W-2012-00056:

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-2 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	9.31 su	6.5-9.0 su	3/24/2011
Boron	2.2 mg/l	2.0 mg/l	3/24/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-3 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	9.20 su	6.5-9.0 su	9/13/2011
Boron	2.3 mg/l	2.0 mg/l	6/13/2011
Boron	2.2 mg/l	2.0 mg/l	3/24/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-4 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	0.36 mg/l	0.15 mg/l	9/13/2011
Boron	2.2 mg/l	2.0 mg/l	3/14/2012
Boron	2.1 mg/l	2.0 mg/l	12/6/2011
Boron	2.1 mg/l	2.0 mg/l	3/24/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, WAUKEGAN GENERATING STATION, ID:6281
VIOLATION NOTICE NO. W-2012-00056

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-5 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Iron	6.6 mg/l	5.0 mg/l	3/14/2012
Iron	5.6 mg/l	5.0 mg/l	12/6/2011
Manganese	0.76 mg/l	0.15 mg/l	3/14/2012
Manganese	0.99 mg/l	0.15 mg/l	12/6/2011
Manganese	0.28 mg/l	0.15 mg/l	6/13/2011
Manganese	0.60 mg/l	0.15 mg/l	3/24/2011
Boron	44 mg/l	2.0 mg/l	3/14/2012
Boron	37 mg/l	2.0 mg/l	12/6/2011
Boron	30 mg/l	2.0 mg/l	9/13/2011
Boron	12 mg/l	2.0 mg/l	6/13/2011
Boron	33 mg/l	2.0 mg/l	3/24/2011
Sulfate	980 mg/l	400 mg/l	3/14/2012
Sulfate	1,100 mg/l	400 mg/l	12/6/2011
Sulfate	810 mg/l	400 mg/l	9/13/2011
Sulfate	1,100 mg/l	400 mg/l	6/13/2011
Sulfate	780 mg/l	400 mg/l	3/24/2011
Sulfate	920 mg/l	400 mg/l	10/25/2010
Chloride	220 mg/l	200 mg/l	9/13/2011
Chloride	540 mg/l	200 mg/l	6/13/2011
TDS	2,000 mg/l	1,200 mg/l	3/14/2012
TDS	2,300 mg/l	1,200 mg/l	12/6/2011
TDS	2,300 mg/l	1,200 mg/l	9/13/2011
TDS	3,300 mg/l	1,200 mg/l	6/13/2011
TDS	1,800 mg/l	1,200 mg/l	3/24/2011
TDS	1,500 mg/l	1,200 mg/l	10/25/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 I11. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Water System Name Waukegan Station

W-2012 - 00056

DW Distribution List and/or bccs

X	VN Central File (Bev)		02 File		Marcia Willhite		Geoff Andres
	Mike Crumly		Dianne Potter		Jeri Long	~	Andrea Rhodes
	Paul Connelly		Allison Ristau		Mary Reed		Jewel Brant
	Sharon Dowson						
	Dave McMillan	X	Rick Cobb		Jerry Kuhn		
	Springfield FOS		Champaign FOS		Collinsville FOS		Elgin FOS
	Rockford FOS		Marion FOS				
X	Connie Tonsor		DLC File		Chuck Gunnarson	X	Chad Kruse
	Jason Boltz		John Kim		Joey Logan-Wilkey	X	Tom Poulter

Meeting/Response Due Date

Agency Response Due:		Meeting Due:	

Approvals (when Applicable)

Dave McMillan Approval On _____	Jerry Kuhn Approval On _____
Marcia Willhite Approval On _____	John Kim Approval On _____

cc: Addresses (if not already provided on merge)

_____	_____	_____
_____	_____	_____
_____	_____	_____

SPECIAL INSTRUCTIONS: _____

_____

Correspondence Route Slip

Initiated By GW	CAS Contact Andrea Rhodes
Mail Out DUE Date	Today's Date
Peer Review Completed On 6-4-12	Peer Reviewer Mary Reed
Supervisor Review Initials SRH 6/11/12	

EXHIBIT N: IEPA Violation Notice for Will County.

Letter from Michael Crumly, Illinois EPA, to Basil G. Constantelos, Midwest Generation (June 11, 2012) (transmitting Violation Notice for Will County Generating Station, Violation Notice No. W-2012-00058).

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-0561

June 11, 2012

CERTIFIED MAIL # 7010 2780 0002 1163 7230
RETURN RECEIPT REQUESTED

Mr. Basil G. Constantelos: Managing Director, Environmental Services
Midwest Generation EME, LLC
2535 Remington Blvd
Suite A
Bolingbrook, IL 60440

Re: Violation Notice: Midwest Generation, LLC, Will County Generating Station
Identification No.: 6283
Violation Notice No.: W-2012-00058

Dear Mr. Constantelos:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Public Water Supplies
Attn: Andrea Rhodes, CAS #19
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, W-2012-00058.

Questions regarding this Violation Notice should be directed to Andrea Rhodes at 217/785-0561.

Sincerely,

Michael Crumly
Manager, Compliance Assurance Section
Division of Public Water Supplies
Bureau of Water

Attachments

cc: Maria Race

CASE ID: 2012-006

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

A review of information available to the Illinois EPA indicates the following on-going violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation.

Groundwater Quality

No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or an existing or potential use of such groundwater is precluded. No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard to be exceeded. Midwest Generation, LLC must take actions to mitigate existing contamination and prevent the continuing release of contaminants into the environment.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-1 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Antimony	0.0063 mg/l	0.006 mg/l	12/08/2011
Manganese	0.16 mg/l	0.15 mg/l	03/16/2012
Manganese	0.17 mg/l	0.15 mg/l	12/08/2011
Manganese	0.16 mg/l	0.15 mg/l	09/15/2011
Manganese	0.22 mg/l	0.15 mg/l	06/15/2011
Manganese	0.20 mg/l	0.15 mg/l	12/13/2010
Sulfate	430 mg/l	400 mg/l	03/16/2012
Sulfate	530 mg/l	400 mg/l	12/13/2010
Chloride	210 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-2 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Antimony	0.017 mg/l	0.006 mg/l	12/08/2011
Antimony	0.0073 mg/l	0.006 mg/l	09/15/2011
Boron	2.30 mg/l	2.0 mg/l	09/15/2011
Boron	2.30 mg/l	2.0 mg/l	06/15/2011
Sulfate	430 mg/l	400 mg/l	12/13/2010
Chloride	250 mg/l	200 mg/l	03/28/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-3 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Boron	2.7 mg/l	2.0 mg/l	03/16/2012
Boron	2.8 mg/l	2.0 mg/l	12/08/2011
Boron	3.3 mg/l	2.0 mg/l	09/15/2011
Boron	2.6 mg/l	2.0 mg/l	06/15/2011
Boron	2.4 mg/l	2.0 mg/l	03/28/2011
Boron	2.7 mg/l	2.0 mg/l	12/13/2010
Chloride	250 mg/l	200 mg/l	03/28/2011
Manganese	0.27 mg/l	0.15 mg/l	03/16/2012
Manganese	0.29 mg/l	0.15 mg/l	12/08/2011
Manganese	0.26 mg/l	0.15 mg/l	09/15/2011
Manganese	0.34 mg/l	0.15 mg/l	06/15/2011
Manganese	0.31 mg/l	0.15 mg/l	03/28/2011
Manganese	0.34 mg/l	0.15 mg/l	12/13/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-4 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Boron	4.0 mg/l	2.0 mg/l	03/16/2012
Boron	3.0 mg/l	2.0 mg/l	12/08/2011
Boron	4.3 mg/l	2.0 mg/l	09/15/2011
Boron	3.6 mg/l	2.0 mg/l	06/15/2011
Boron	3.3 mg/l	2.0 mg/l	03/29/2011
Boron	3.7 mg/l	2.0 mg/l	12/13/2010
Manganese	0.60 mg/l	0.15 mg/l	03/16/2012
Manganese	0.60 mg/l	0.15 mg/l	12/08/2011
Manganese	1.00 mg/l	0.15 mg/l	09/15/2011
Manganese	0.70 mg/l	0.15 mg/l	06/15/2011
Manganese	0.58 mg/l	0.15 mg/l	03/29/2011
Manganese	0.52 mg/l	0.15 mg/l	12/13/2010
Sulfate	2,000 mg/l	400 mg/l	03/16/2012
Sulfate	1,600 mg/l	400 mg/l	12/08/2011
Sulfate	4,800 mg/l	400 mg/l	09/15/2011
Sulfate	1,600 mg/l	400 mg/l	06/15/2011
Sulfate	1,500 mg/l	400 mg/l	03/29/2011
Sulfate	1,500 mg/l	400 mg/l	12/13/2010
TDS	3,700 mg/l	1,200 mg/l	03/16/2012
TDS	3,100 mg/l	1,200 mg/l	12/08/2011
TDS	6,000 mg/l	1,200 mg/l	09/15/2011
TDS	2,800 mg/l	1,200 mg/l	06/15/2011
TDS	2,600 mg/l	1,200 mg/l	03/29/2011
TDS	2,500 mg/l	1,200 mg/l	12/13/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-5 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	9.3 su	6.5-9.0 su	03/16/2012
pH	9.51 su	6.5-9.0 su	03/28/2011

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

Violation
Description
MW-5 continued

Parameter	Sample Value	GW Standard	Collection Date
Boron	2.9 mg/l	2.0 mg/l	03/16/2012
Boron	3.2 mg/l	2.0 mg/l	12/08/2011
Boron	4.0 mg/l	2.0 mg/l	09/15/2011
Boron	3.2 mg/l	2.0 mg/l	06/15/2011
Boron	2.7 mg/l	2.0 mg/l	03/29/2011
Boron	2.6 mg/l	2.0 mg/l	12/13/2010
Sulfate	500 mg/l	400 mg/l	12/08/2011
Sulfate	690 mg/l	400 mg/l	09/15/2011
Sulfate	540 mg/l	400 mg/l	06/15/2011
Sulfate	570 mg/l	400 mg/l	03/29/2011
Sulfate	580 mg/l	400 mg/l	12/13/2010
TDS	1,500 mg/l	1,200 mg/l	09/15/2011
TDS	1,400 mg/l	1,200 mg/l	06/15/2011
TDS	1,300 mg/l	1,200 mg/l	03/29/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-6 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	9.39 su	6.5-9.0 su	03/16/2012
pH	9.44 su	6.5-9.0 su	09/15/2011
pH	9.27 su	6.5-9.0 su	06/15/2011
pH	9.65 su	6.5-9.0 su	03/29/2011
Boron	2.5 mg/l	2.0 mg/l	03/16/2012
Boron	2.5 mg/l	2.0 mg/l	12/08/2011
Boron	3.0 mg/l	2.0 mg/l	09/15/2011
Boron	2.4 mg/l	2.0 mg/l	06/15/2011
Boron	2.5 mg/l	2.0 mg/l	03/28/2011
Boron	2.7 mg/l	2.0 mg/l	12/13/2010
Chloride	210 mg/l	200 mg/l	03/28/2011
Sulfate	440 mg/l	400 mg/l	12/08/2011
Sulfate	420 mg/l	400 mg/l	09/15/2011

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

Violation
Description
MW-6 continued

Parameter	Sample Value	GW Standard	Collection Date
Sulfate	570 mg/l	400 mg/l	06/15/2011
Sulfate	540 mg/l	400 mg/l	03/28/2011
Sulfate	500 mg/l	400 mg/l	12/13/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation
Description
Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-7 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Manganese	0.20 mg/l	0.15 mg/l	03/16/2012
Manganese	0.20 mg/l	0.15 mg/l	12/08/2011
Manganese	0.18 mg/l	0.15 mg/l	09/15/2011
Boron	5.1 mg/l	2.0 mg/l	03/16/2012
Boron	5.0 mg/l	2.0 mg/l	12/08/2011
Boron	3.4 mg/l	2.0 mg/l	09/15/2011
Boron	5.7 mg/l	2.0 mg/l	06/15/2011
Boron	5.0 mg/l	2.0 mg/l	03/29/2011
Boron	4.7 mg/l	2.0 mg/l	12/13/2010
Sulfate	770 mg/l	400 mg/l	03/16/2012
Sulfate	710 mg/l	400 mg/l	12/08/2011
Sulfate	710 mg/l	400 mg/l	09/15/2011
Sulfate	1,000 mg/l	400 mg/l	06/15/2011
Sulfate	650 mg/l	400 mg/l	03/29/2011
Sulfate	610 mg/l	400 mg/l	12/13/2010
TDS	1,400 mg/l	1,200 mg/l	03/16/2012
TDS	1,300 mg/l	1,200 mg/l	12/08/2011
TDS	1,400 mg/l	1,200 mg/l	09/15/2011
TDS	1,600 mg/l	1,200 mg/l	06/15/2011
TDS	1,500 mg/l	1,200 mg/l	03/29/2011
TDS	1,300 mg/l	1,200 mg/l	12/13/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-8 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Boron	2.3 mg/l	2.0 mg/l	09/15/2011
Chloride	270 mg/l	200 mg/l	03/29/2011
Manganese	0.40 mg/l	0.15 mg/l	12/08/2011
Manganese	0.45 mg/l	0.15 mg/l	09/15/2011
Manganese	0.47 mg/l	0.15 mg/l	06/15/2011
Manganese	0.44 mg/l	0.15 mg/l	03/29/2011
Manganese	0.33 mg/l	0.15 mg/l	12/13/2010
Sulfate	600 mg/l	400 mg/l	09/15/2011
Sulfate	420 mg/l	400 mg/l	06/15/2011
Sulfate	440 mg/l	400 mg/l	03/29/2011
Sulfate	440 mg/l	400 mg/l	12/13/2010
TDS	1,300 mg/l	1,200 mg/l	09/15/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-9 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
pH	10.56 su	6.5-9.0 su	03/16/2012
pH	9.55 su	6.5-9.0 su	12/08/2011
pH	10.27 su	6.5-9.0 su	09/15/2011
pH	10.44 su	6.5-9.0 su	06/15/2011
pH	10.87 su	6.5-9.0 su	03/29/2011
Boron	2.2 mg/l	2.0 mg/l	12/13/2010
Chloride	230 mg/l	200 mg/l	06/15/2011
Chloride	280 mg/l	200 mg/l	03/29/2011
Sulfate	410 mg/l	400 mg/l	06/15/2011
Sulfate	410 mg/l	400 mg/l	12/13/2010

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

ATTACHMENT A

MIDWEST GENERATION, LLC, WILL COUNTY GENERATING STATION, ID:6283
VIOLATION NOTICE NO. W-2012-00058:

Violation Description

Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring well MW-10 for the following constituents:

Parameter	Sample Value	GW Standard	Collection Date
Boron	2.1 mg/l	2.0 mg/l	03/16/2012
Boron	2.5 mg/l	2.0 mg/l	12/08/2011
Boron	2.8 mg/l	2.0 mg/l	09/15/2011
Boron	2.2 mg/l	2.0 mg/l	06/15/2011
Boron	2.1 mg/l	2.0 mg/l	12/13/2010
Manganese	0.25 mg/l	0.15 mg/l	03/16/2012
Manganese	0.29 mg/l	0.15 mg/l	12/08/2011
Manganese	0.27 mg/l	0.15 mg/l	09/15/2011
Manganese	0.25 mg/l	0.15 mg/l	06/15/2011
Manganese	0.22 mg/l	0.15 mg/l	03/28/2011
Manganese	0.25 mg/l	0.15 mg/l	12/13/2010
Sulfate	420 mg/l	400 mg/l	09/15/2011

Rule/Reg. Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

Water System Name Will County

W-20 12-00058

DW Distribution List and/or bccs

X	VN Central File (Bev)		02 File		Marcia Willhite		Geoff Andres
	Mike Crumly		Dianne Potter		Jeri Long		Andrea Rhodes
	Paul Connelly		Allison Ristau		Mary Reed		Jewel Brant
	Sharon Dowson						
	Dave McMillan	X	Rick Cobb		Jerry Kuhn		
	Springfield FOS		Champaign FOS		Collinsville FOS		Elgin FOS
	Rockford FOS		Marion FOS				
X	Connie Tonsor		DLC File		Chuck Gunnarson	X	Chad Kruse
	Jason Boltz		John Kim		Joey Logan-Wilkey	X	TOM Reuter

Meeting/Response Due Date

Agency Response Due:		Meeting Due:	

Approvals (when Applicable)

Dave McMillan Approval On _____	Jerry Kuhn Approval On _____
Marcia Willhite Approval On _____	John Kim Approval On _____

cc: Addresses (if not already provided on merge)

SPECIAL INSTRUCTIONS: _____

Correspondence Route Slip

Initiated By	CAS Contact
Mail Out DUE Date	Today's Date
Peer Review Completed On 6-4-12	Peer Reviewer Mary Reed
Supervisor Review Initials SRH 6/11/12	

Illinois Pollution Control Board
2013-015

Exhibit B

To Citizens Groups' Reply to MWG's Response to Complainants' Second Motion for Leave to File Amended Complaint

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

~~FIRST~~SECOND AMENDED COMPLAINT

FACTUAL BACKGROUND

1. Midwest Generation, LLC ("MWG") owns and operates the Joliet #29 Generating Station ("Joliet 29") in Joliet, Illinois in Will and Kendall Counties, on the north side of the Des Plaines River. MWG has historically stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to, two or more landfills and three ash ponds (two HDPE-lined, one geocomposite-lined) on the same side of the river, and continues to store or dispose of coal ash and other coal combustion waste in these ponds or repositories.

2. MWG installed eleven groundwater monitoring wells (MW-1 through MW-11) around the Joliet 29 ash ponds in 2010, as depicted in the well map included in MWG groundwater monitoring reports for Joliet 29, attached hereto as Exhibit A. Since monitoring began in late 2010, groundwater monitoring results have shown levels of antimony, boron, chloride, iron, manganese, sulfate, and Total Dissolved Solids ("TDS") which exceed Illinois Groundwater Quality Standards ("GQSs"). *See* violations of Class I and Class II GQSs and

MWG groundwater monitoring data for Joliet 29, attached hereto as Exhibits B, C, and D, respectively.

3. MWG owns and operates the Powerton Generating Station ("Powerton") in Pekin, Illinois in Tazewell County. MWG has historically stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to three active ash ponds on the site, two of them lined; one less active ash pond on the site; up to two additional ponds or basins containing coal ash and other coal combustion waste; and a former slag dumping area. MWG continues to store or dispose of coal ash and other coal combustion waste in these ponds or repositories.

4. MWG monitors groundwater at Powerton with a network of 15 wells (MW-1 through MW-15, depicted in the well map included in MWG groundwater monitoring reports for Powerton, attached hereto as Exhibit E). Since monitoring began in late 2010, groundwater monitoring results have shown levels of antimony, arsenic, boron, chloride, iron, lead, manganese, nitrate, selenium, sulfate, thallium, and TDS which exceed Illinois GQS and/or open dumping standards. *See* violations of Class I and Class II GQSs and MWG groundwater monitoring data for Powerton, attached hereto as Exhibits B, C, and F, respectively.

5. MWG owns and operates the Waukegan Generating Station ("Waukegan") in Waukegan, Illinois in Lake County. There are two active HDPE-lined ponds at this site. MWG has stored and disposed of coal ash and other coal combustion waste in repositories that include, but are not limited to, these two ponds and one former ash landfill or disposal area, and continues to do so.

6. MWG installed 5 wells (MW-1 through MW-5) around the Waukegan ash ponds in 2010, as depicted in the well map included in MWG groundwater monitoring reports for

Waukegan, attached hereto as Exhibit G. Groundwater monitoring results from Waukegan show levels of antimony, arsenic, boron, chloride, iron, manganese, nitrate, selenium, pH, sulfate, and TDS which exceed Illinois GQS and/or open dumping standards. *See* violations of Class I and Class II GQSs and MWG groundwater monitoring data for Waukegan, attached hereto as Exhibits B, C, and H, respectively.

7. MWG owns and operates the Will County Generating Station ("Will County") in Romeoville, Illinois in Will County. MWG has stored and disposed of coal ash and other coal combustion waste at the site in repositories that include four geocomposite-lined ponds and two or more additional ponds. MWG continues to store and dispose of coal ash and other coal combustion waste in one or more of these ponds.

8. MWG installed 10 wells around the Will County plant's ponds in 2010 (MW-1 through MW-10; *see* the well map included in MWG groundwater monitoring reports for Will County, attached hereto as Exhibit I.) Groundwater monitoring results from Will County show levels of antimony, arsenic, boron, chloride, manganese, pH, selenium, sulfate, and TDS which exceed Illinois GQS and/or open dumping standards. *See* violations of Class I and Class II GQSs and MWG groundwater monitoring data for Will County, attached hereto as Exhibits B, C, and J, respectively.

9. On June 11, 2012, the Illinois Environmental Protection Agency ("IEPA") sent MWG Violation Notices describing violations of Section 12 of the Illinois Environmental Protection Act, 415 ILCS 5/12, and Groundwater Quality regulations at Joliet 29, Powerton, Waukegan, and Will County. *See* Violation Notices for Powerton, Joliet 29, Waukegan, and Will County, attached hereto as Exhibits K–N. In the Violation Notices IEPA identified

groundwater monitoring results that exceeded Illinois Class I GQS, which are found at 35 IAC 620.410.

THE POLLUTANTS

10. As set forth in detail in Exhibit B, groundwater monitoring results at Joliet 29, Powerton, Waukegan, and/or Will County have exceeded Illinois Class I GQS, 35 Ill. Admin. Code § 620.410, for the following pollutants: Antimony, arsenic, boron, chloride, iron, lead, manganese, mercury, nitrate, selenium, sulfate, total dissolved solids, and thallium.

11. Many of the pollutants found at elevated concentrations in the groundwater monitoring results at Joliet 29, Powerton, Waukegan, and/or Will County are constituents of coal ash.[1]

12. As MWG recognizes, boron is a primary indicator of potential coal ash impacts to groundwater.

13. The pollutants listed in this complaint, when present at the concentrations found in MWG's groundwater wells, make the groundwater unusable. Many of these pollutants are toxic and have been found at concentrations that present a human health risk. Others are dangerous to aquatic ecosystems; this is a significant concern to the extent that contaminated groundwater is migrating into adjacent surface water bodies.

14. Antimony is associated with reduced lifespan, decreased blood glucose, and altered cholesterol in rodents, and with vomiting and cardiac and respiratory effects in humans.[2] To protect public health, the U.S. EPA has established a Maximum Contaminant Level (MCL) of

[1] *See, e.g.*, U.S. EPA, Human and Ecological Risk Assessment of Coal Combustion Wastes at 2-4 (Draft, April 2000) (listing Coal Combustion Waste constituents), *available at* http://earthjustice.org/sites/default/files/library/reports/epa-coal-combustion-waste-risk-assessment.pdf (last visited October 2, 2012).

[2] *See, e.g.*, U.S. EPA, Integrated Risk Information System: Antimony, http://www.epa.gov/iris/subst/0006.htm; California EPA, Draft Public Health Goal for Antimony in Drinking Water (July 2009).

0.006 mg/L. The Illinois Class I GQS for antimony is also 0.006 mg/L. Even this level may be unsafe; the California EPA, for example, has proposed a much lower Public Health Goal of 0.0007 mg/L.[3]

15. Arsenic is known to cause multiple forms of cancer in humans and is also associated with non-cancer health effects of the skin and the nervous system.[4] Groundwater that exceeds Illinois GQSs for arsenic is highly toxic; based on current U.S. EPA risk estimates, the cancer risk associated with drinking water at 0.05 mg/L, the Illinois Class I GQS for arsenic, is greater than 2 in 1,000.[5] The risk at 0.2 mg/L, the Class II GQS, is 1 in 100.

16. Oral exposure to boron has led to developmental and reproductive toxicity in multiple species. Specific effects include testicular degeneration, reduced sperm count, reduced birth weight, and birth defects.[6] The EPA has established a child health advisory of 3 mg/L for boron, close to the Illinois Class I and Class II GQS of 2 mg/L.[7]

17. Chloride renders water unusable by imparting a salty taste; to prevent this the EPA has set a secondary drinking water regulation of 250 mg/L, close to the Illinois Class I and Class II GQS of 200 mg/L.[8]

18. Iron renders water unusable by imparting a rusty color and a metallic taste and causing sedimentation and staining; to prevent these effects the EPA has set a secondary drinking water regulation of 0.3 mg/L.[9] The Illinois Class I and II GQS for iron, at 5 mg/L, is much

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[3] *See* California EPA, *supra* note 2.
[4] *See, e.g.*, U.S. EPA, Integrated Risk Information System: Arsenic, inorganic, http://www.epa.gov/iris/subst/0278.htm; U.S. Agency for Toxic Substances and Disease Registry (ATSDR), Toxicological Profile for Arsenic (Aug. 2007).
[5] Derived from the U.S. EPA drinking water unit risk of 5E-5 per ug/L. U.S. EPA, *supra* note 8.
[6] *See, e.g.*, U.S. EPA, Toxicological Profile of Boron and Compounds 60-61 (June 2004).
[7] U.S. EPA, 2012 Edition of the Drinking Water Standards and Health Advisories (April, 2012).
[8] U.S. EPA, Secondary Drinking Water Regulations: Guidance for Nuisance Chemicals, http://water.epa.gov/drink/contaminants/secondarystandards.cfm.
[9] *Id*.

higher than the EPA secondary drinking water regulation, suggesting that violations of the GQS represent concentrations of iron far higher than what would be usable.

19. Lead is known to be toxic to the nervous system, and is particularly associated with effects on childhood neurobehavioral development at very low doses. Lead is also classified by the EPA as a "probable human carcinogen."[10] The EPA Action Level for lead in drinking water is 0.015 mg/L.[11] This is unlikely to represent a "safe" level of exposure—the EPA has noted, for example, that there may be no threshold for lead toxicity.[12] Groundwater concentrations of lead above the Illinois Class I GQS, 0.0075 mg/L, are thus unsafe to drink.

20. Manganese is also known to be toxic to the nervous system.[13] The EPA has not updated its assessment of manganese toxicity in 16 years, so EPA standards and advisories may not reflect the latest scientific knowledge concerning effects on childhood neurological development,[14] and the EPA Lifetime Health Advisory for manganese – 0.3 mg/L – may not be adequately health-protective. In any event, manganese concentrations greater than 0.05 mg/L render water unusable by discoloring the water, giving it a metallic taste, and causing black staining.[15] Groundwater with manganese above the Illinois Class I GQS – 0.15 mg/L – is clearly not usable and is likely to be toxic.

21. Inorganic mercury is toxic to the kidneys, and has also been associated with developmental toxicity.[16] The California EPA Public Health Goal for ionorganic mercury is 0.0012 mg/L; the U.S. EPA MCL, like the Illinois Class I GQS, is 0.002 mg/L.[17]

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[10] U.S. EPA, Integrated Risk Information System: Lead and Compounds, http://www.epa.gov/iris/subst/0277.htm.
[11] U.S. EPA drinking water standards, *supra* note 7.
[12] U.S. EPA, IRIS web page for lead, *supra* note 10.
[13] *See, e.g.*, U.S. EPA, Integrated Risk Information System: Manganese, http://www.epa.gov/iris/subst/0373.htm.
[14] *See, e.g.*, G.A. Wasserman et al., Water manganese exposure and children's intellectual function in araihazar, Bangladesh. 114 ENVIRON. HEALTH PERSP. 124 (2006).
[15] *See* U.S. EPA secondary drinking water regulations, *supra* note 8.
[16] *See*, e.g., California EPA, Public Health Goal for Inorganic Mercury in Drinking Water (Feb. 1999).

22. Nitrate is known to cause methemoglobinemia in infants, a condition that impairs oxygen delivery to tissues and can cause bluish skin coloration. The U.S. EPA MCL, the California EPA Public Health Goal, and the Illinois Class I and II GQSs are all 10 mg/L, a level at which infant methemoglobinemia is not expected to occur.[18]

23. Selenium is an essential element, but excess exposure can cause a chemical-specific condition known as selenosis, with symptoms that include hair and nail loss. Various agencies have derived health-protective values between 0.01 and 0.05 mg/L, but are in agreement that selenium concentrations above 0.05 mg/L, the Illinois Class I and II GQS, are unsafe to drink.[19]

24. High concentrations of sulfates in drinking water impart a salty taste and can cause diarrhea; to protect against these effects, the U.S. EPA has established a secondary MCL of 250 mg/L and a health-based advisory of 500 mg/L.[20] Groundwater with sulfate concentrations above the Illinois Cass I and Class II GQS of 400 mg/L is therefore unusable and potentially unsafe.

25. Total Dissolved Solids (TDS) is a measure of multiple dissolved chemicals, but because high TDS is generally associated with hardness, staining, salty taste, and deposits, the U.S. EPA has established a secondary MCL of 500 mg/L.[21] Groundwater with TDS above the Illinois Class I and Class II GQS, 1,200 mg/L, is clearly unusable.

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[17] Id.; U.S. EPA drinking water standards, *supra* note 7.
[18] *See* U.S. EPA, Integrated Risk Information System: Nitrate, http://www.epa.gov/iris/subst/0076.htm.; California EPA, Public Health Goals for Nitrate and Nitrite (Dec. 1997).
[19] *See, e.g.*, California EPA, Public Health Goal for Selenium (Dec. 2010) (Setting a Public Health Goal of 0.03 mg/L); World Health Organization, Guidelines for Drinking Water Quality, 4th Ed., 413 (2011) (Setting a provisional guideline of 0.04 mg/L); U.S. EPA drinking water standards, *supra* note 11 (setting forth a MCL of 0.05 mg/L).
[20] U.S. EPA, Drinking Water Advisory: Consumer Acceptability Advice and Health Effects Analysis on Sulfate (Feb. 2003).
[21] *See* U.S. EPA secondary drinking water regulations, *supra* note 8.

26. Thallium is known to cause neurotoxicity, and is also associated with developmental and reproductive toxicity and other adverse health effects. The Illinois Class I GQS and the U.S. EPA MCL are both 0.002 mg/L.[22]

27. Finally, many of the pollutants associated with coal ash, including but not limited to selenium, are known to bioaccumulate in aquatic ecosystems causing tissue damage and other effects in fish and amphibians. One review, for example, noted that "the combined effects of multiple accumulated elements may lead to numerous changes in individuals that could compromise individual fitness or health," and provided several examples of coal ash-contaminated sites where the health of individuals and communities in aquatic ecosystems had been severely impaired.[23]

PARTIES

28. Citizens Against Ruining the Environment ("CARE") is located at 230 E. 6th Street, Lockport, IL 60441. CARE is an incorporated, not-for-profit community organization with members in the Lockport area, including Will County. CARE was organized for the purpose of preserving and protecting Illinois's land, air, water, and other natural resources, and protecting the organization's members and other residents of the state from threats of pollution.

29. The Environmental Law and Policy Center ("ELPC") is an Illinois not-for-profit corporation with its principal office located at 35 East Wacker Drive, Suite 1600, Chicago, IL 60601. ELPC's mission includes advocating for the protection of water quality, and protection of public health related to water quality, throughout the Midwest.

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[22] *See* U.S. EPA drinking water standards, *supra* note 7.

[23] C.L. Rowe et al., Ecotoxicological implications of aquatic disposal of coal combustion residues in the United States: A review, 80 ENVTL. MONITORING AND ASSESSMENT 207, 242 (2002); see also A.D. Lemly and J.P. Skorupa, Wildlife and the coal waste policy debate: Proposed rules or coal waste disposal ignore lessons from 45 years of wildlife poisoning, 46 ENVTL. SCI. TECH. 46 (2012).

30. Prairie Rivers Network, a nonprofit organization and a state affiliate of the National Wildlife Federation, is Illinois' statewide leader in river protection, conservation, and restoration. Prairie Rivers Network has a membership of over 700 in Illinois.

31. Sierra Club is the nation's oldest and largest grassroots environmental organization. Sierra Club is an incorporated, not-for-profit organization with headquarters located at 85 Second Street, 2nd Floor, San Francisco, CA, 94105. Sierra Club's Illinois Chapter office is located at 70 E. Lake St., Suite 1500, Chicago, IL, 60601. Sierra Club's mission is to preserve, protect, and enhance the natural environment. Sierra Club has 641,000 members, including approximately 23,000 members in Illinois.

32. Midwest Generation, LLC (MWG), is a Delaware Corporation doing business in Illinois with principal executive offices at 235 Remington Boulevard, Suite A, Bolingbrook, Illinois 60440. MWG's registered agent is C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, Illinois 60604. MWG is a subsidiary of Edison Mission Energy ("EME"), of Santa Ana, California. EME is a subsidiary of Edison International, 2244 Walnut Grove Avenue, (P.O. Box 976), Rosemead, California, 91770.

LEGAL BACKGROUND: OPEN DUMPING

33. The Illinois Environmental Protection Act prohibits "the open dumping of any waste." 415 ILCS 5/21(a). "Open dumping" is defined as "the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill." 415 ILCS 5/3.305. "Refuse" is defined as "waste." 415 ILCS 5/3.385. "Waste" is defined to include "any garbage, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural

operations" at 415 ILCS 5/3.535. "Sanitary landfills" are defined as "facilit[ies] permitted by the Agency for the disposal waste on land meeting the requirements of the Resource Conservation and Recovery Act [42 USCA § 6901 et seq.]." 415 ILCS 5/3.445. The requirements of the Resource Conservation and Recovery Act include criteria for distinguishing between sanitary landfills and open dumps. 42 USCA § 6944(a). These criteria are found in federal regulations at 40 CFR Part 257. According to 40 CFR § 257.1, facilities failing to meet, inter alia, the criterion at 40 CFR § 257.3-4 are considered prohibited open dumps.

34. 40 CFR § 257.3-4 establishes a criterion for identifying open dumps based on groundwater contamination. 40 CFR § 257.3-4 prohibits "contaminat[ion of] an underground drinking water source beyond the solid waste boundary or beyond an alternative compliance boundary." The contamination must exist beyond either the perimeter of the solid waste disposal area or beyond an alternative boundary established by the state or the courts after finding that establishing such a boundary will not result in the contamination of groundwater that may be used for drinking. 40 C.F.R. § 257.3-4.

35. Groundwater contamination for purposes of RCRA open dumping is demonstrated by an exceedance of one of the Maximum Contaminant Levels (MCLs) set forth in 40 CFR pt. 257 Appendix I (hereinafter "Appendix I MCLs"),[24] in either an actual drinking water source, or in an aquifer with less than 10,000 mg/L total dissolved solids. 40 CFR § 257.3-4. The Appendix I MCLs for the pollutants identified in this complaint are as follows:

Chemical	Appendix I MCL

[24] The open dumping MCLs in 40 CFR pt. 257 Appendix I are in some cases different from the most recent Maximum Contaminant Levels promulgated by the U.S. Environmental Protection Agency. For example, the Appendix I MCL for arsenic is 50 ug/L while the current MCL for arsenic is 10 ug/L. *See* U.S. EPA drinking water standards, *supra* note 7.

	(40 C.F.R. Pt. 257, App. I)
Arsenic	0.05 mg/L
Mercury	0.002 mg/L
Nitrate	10 mg/L
Selenium	0.01 mg/L

LEGAL BACKGROUND: WATER POLLUTION

36. The Illinois Environmental Protection Act prohibits "the discharge of any contaminants into the environment . . . so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources," 415 ILCS 5/12(a), and prohibits the deposition of "any contaminants upon the land in such place and manner so as to create a water pollution hazard." 415 ILCS 5/12(d). "Water pollution" is defined as the "alteration" or "discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life." 415 ILCS 5/3.545. "Waters" of the State is defined to include "all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State." 415 ILCS 5/3.550.

37. 35 Ill. Admin. Code § 620.405 prohibits "the release of any contaminant to groundwater so as to cause a groundwater quality standard set forth in this Subpart to be exceeded." 35 Ill. Admin. Code § 620.405. The Illinois Administrative Code establishes different groundwater quality standards for Class I and Class II groundwater.

38. 35 Ill. Admin. Code § 620.410 establishes Class I GQSs that cannot be exceeded in potable resource groundwater. "Potable resource groundwater" is defined as:

> Groundwater located 10 feet or more below the land surface and within: (1) The minimum setback zone of a well which serves as a potable water supply and to the bottom of such well; (2) Unconsolidated sand, gravel or sand and gravel which is 5 feet or more in thickness and that contains 12 percent or less of fines . . . ; (3) Sandstone which is 10 feet or more in thickness, or fractured carbonate which is 15 feet or more in thickness; or (4) Any geologic material which is capable of a: (A) sustained groundwater yield , from up to a 12 inch borehole, of 150 gallons per day or more from a thickness of 15 feet or less; or (B) Hydraulic conductivity of 1 x 10(-4) cm/sec or greater using one of the following test methods or its equivalent: (i) Permeameter; (ii) Slug test; or (iii) Pump test. 35 Ill. Admin. Code § 620.210(a).

39. The definition of Class I groundwater specifically excludes: Class III "special resource groundwater," Class IV "other groundwater," which includes groundwater in a zone of attenuation; and groundwater in a "groundwater management zone." 35 Ill. Admin. Code § 620.210; *see also* 35 Ill. Admin. Code §§ 620.230, 620.240, 620.250.35 Ill. Admin. Code § 620.115 provides that "No person shall cause, threaten or allow a violation of the Act, the [Illinois Groundwater Protection Act] or regulations adopted by the Board thereunder, including but not limited to this part."35 Ill. Admin. Code § 620.301(a) provides that "No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: 1) Treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or 2) An existing or potential use of such groundwater is precluded."

40. 35 Ill. Admin. Code § 620.420 establishes Class II GQSs that cannot be exceeded in general resource groundwater. "General resource groundwater" is defined as "groundwater which does not meet the provisions of . . . Class I . . . Class III . . . or . . . Class IV" and "groundwater which is found by the Board, pursuant to the petition procedures set forth in Section 620.260, to be capable of agricultural, industrial, recreational or other beneficial uses." 35 Ill. Admin. Code § 620.220. Groundwater in a zone of attenuation must meet Class II GQSs. 35 Ill. Admin. Code § 620.440(b).

The Illinois Class I and Class II GQSs for pollutants identified in this report are as follows:

Chemical	Class I GQS (mg/L) (35 Ill. Admin. Code § 620.410)	Class II GQS (mg/L) (35 IAC § 620.420)
Antimony	0.006	0.024
Arsenic	0.01	0.2
Boron	2	2
Chloride	200	200
Iron	5	5
Lead	0.0075	0.10
Manganese	0.15	10
Mercury	0.002	0.01
Nitrate	10	100
pH	6.5 – 9.0	6.5 – 9.0
Selenium	0.05	0.05
Sulfate	400	400
Thallium	0.002	0.020
Total Dissolved Solids	1,200	1,200

COUNT I

OPEN DUMPING VIOLATIONS AT POWERTON

41. Paragraphs 1-40 are realleged and incorporated herein by reference.

42. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Powerton, has caused or contributed to contamination of the groundwater beneath Powerton in violation of 415 ILCS 5/21(a), as shown in Table 1.

Table 1: Open dumping violations at Powerton.

	Well	Pollutant	Sample value (mg/L)	Appendix I MCL (mg/L)	Collection date
1	MW-1	Nitrate	11	10	9/20/11
2	MW-4	Selenium	0.013	0.010	2/27/13
3	MW-6	Arsenic	0.200	0.050	5/29/14
4	MW-7	Arsenic	0.085	0.050	3/25/11
5	MW-7	Arsenic	0.120	0.050	6/16/11
6	MW-7	Arsenic	0.180	0.050	9/20/11
7	MW-7	Arsenic	0.230	0.050	12/12/11
8	MW-7	Arsenic	0.230	0.050	3/19/12

9	MW-7	Arsenic	150	0.050	6/25/12
10	MW-7	Arsenic	180	0.050	9/18/12
11	MW-7	Arsenic	260	0.050	12/12/12
12	MW-7	Arsenic	170	0.050	2/27/13
13	MW-7	Arsenic	120	0.050	5/31/13
14	MW-7	Arsenic	220	0.050	7/31/13
15	MW-7	Arsenic	200	0.050	10/23/13
16	MW-7	Arsenic	150	0.050	3/5/14
17	MW-7	Arsenic	190	0.050	8/27/14
18	MW-9	Selenium	0.072[25]	0.010	3/25/11
19	MW-9	Selenium	0.015	0.010	2/27/13
20	MW-9	Selenium	0.016	0.010	5/30/13
21	MW-9	Selenium	0.014	0.010	7/30/13
22	MW-9	Nitrate	12	10	2/27/13
23	MW-9	Nitrate	11	10	5/30/13
24	MW-9	Nitrate	11	10	5/29/14
25	MW-11	Arsenic	0.057	0.050	3/4/14
26	MW-11	Arsenic	0.068	0.050	8/26/14
27	MW-12	Mercury	0.0096[26]	0.002	12/15/10
28	MW-14	Selenium	0.065	0.010	4/25/11
29	MW-14	Selenium	0.022	0.010	4/10/12
30	MW-14	Selenium	0.150	0.010	2/27/13
31	MW-14	Selenium	0.020	0.010	3/4/14
32	MW-14	Selenium	0.014	0.010	5/28/14
33	MW-15	Selenium	0.017	0.010	4/25/11
34	MW-15	Selenium	0.025	0.010	4/10/12
35	MW-15	Selenium	0.013	0.010	10/23/13
36	MW-15	Selenium	0.033	0.010	5/28/14

43. Groundwater samples from nine different wells at Powerton have ~~violated~~exceeded the Appendix I MCLs on the thirty-six occasions delineated in Table 1.

COUNT 2

OPEN DUMPING VIOLATIONS AT WAUKEGAN

44. Paragraphs 1-43 are realleged and incorporated herein by reference.

[25] This value was originally reported as 0.072 mg/L. *See* letter from Richard M. Frendt, Patrick Engineering, to IEPA, Attachment A (July 30, 2012) (transmitting amended groundwater monitoring report for Midwest generation's Powerton Generating Station). MidGen has since revised the value to 0.0072 mg/L. *Id*. at Attachments B and C.

[26] This value was originally reported as 0.0096 ug/L. *Id*. at Attachment A. MidGen has since revised the value to nondetect. *Id*. at Attachments B and C.

45. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Waukegan, has caused or contributed to contamination of the groundwater beneath Waukegan in violation of 415 ILCS 5/21(a), as shown in Table 2.

Table 2: Open dumping violations at Waukegan.

	Well	Pollutant	Sample value (mg/L)	Appendix I MCL (mg/L)	Collection date
1	MW-1	Arsenic	0.054	0.050	10/25/10
2	MW-1	Arsenic	0.170	0.050	6/13/11
3	MW-1	Arsenic	0.077	0.050	9/13/11
4	MW-1	Arsenic	0.057	0.050	12/6/11
5	MW-1	Arsenic	0.078	0.050	3/14/12
6	MW-1	Arsenic	0.070	0.050	6/18/12
7	MW-1	Arsenic	0.070	0.050	9/28/12
8	MW-1	Arsenic	0.091	0.050	12/19/12
9	MW-1	Arsenic	0.098	0.050	3/7/13
10	MW-1	Arsenic	0.055	0.050	7/25/13
6	MW-1	Selenium	0.031	0.010	10/25/10
7	MW-1	Selenium	0.030	0.010	3/24/11
8	MW-1	Selenium	0.016	0.010	6/13/11
9	MW-1	Selenium	0.039	0.010	9/13/11
10	MW-1	Selenium	0.032	0.010	12/6/11
11	MW-1	Selenium	0.037	0.010	3/14/12
12	MW-1	Selenium	0.013	0.010	6/18/12
13	MW-1	Selenium	0.056	0.010	3/7/13
14	MW-1	Selenium	0.043	0.010	6/7/13
15	MW-1	Selenium	0.031	0.010	7/25/13
16	MW-1	Selenium	0.013	0.010	11/4/13
17	MW-2	Selenium	0.026	0.010	10/25/10
18	MW-2	Selenium	0.028	0.010	6/13/11
19	MW-2	Selenium	0.022	0.010	9/13/11
20	MW-2	Selenium	0.015	0.010	7/25/13
21	MW-3	Selenium	0.016	0.010	3/24/11
22	MW-3	Selenium	0.030	0.010	6/13/11
23	MW-3	Selenium	0.012	0.010	9/13/11
24	MW-3	Selenium	0.011	0.010	12/6/11
25	MW-3	Selenium	0.011	0.010	3/7/13
26	MW-3	Selenium	0.067	0.010	6/7/13
27	MW-3	Nitrate	13	10	6/7/13
28	MW-4	Selenium	0.022	0.010	6/13/11
29	MW-4	Selenium	0.025	0.010	9/13/11

30	MW-4	Selenium	0.015	0.010	12/6/11
31	MW-4	Selenium	0.028	0.010	6/6/13
32	MW-4	Selenium	0.050	0.010	7/25/13
33	MW-4	Selenium	0.011	0.010	11/4/13

46. Groundwater samples at four of five wells monitored showed ~~violations~~exceedances of the Appendix I MCLs on the thirty-three occasions delineated in Table 2.

COUNT 3

OPEN DUMPING VIOLATIONS AT WILL COUNTY

47. Paragraphs 1-46 are realleged and incorporated herein by reference.

48. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and other coal combustion waste repositories at Will County, has caused or contributed to contamination of the groundwater beneath Will County in violation of 415 ILCS 5/21(a), as shown in Table 3.

Table 3: Open dumping violations at Will County

	Well	Pollutant	Sample value (mg/L)	Appendix I MCL (mg/L)	Collection date
1	MW-4	Selenium	0.015	0.010	3/5/13
2	MW-5	Selenium	0.017	0.010	12/13/10
3	MW-5	Selenium	0.014	0.010	3/28/11
4	MW-5	Selenium	0.016	0.010	6/15/11
5	MW-5	Selenium	0.017	0.010	9/24/12
6	MW-5	Selenium	0.026	0.010	6/5/13
7	MW-5	Selenium	0.170	0.010	10/28/13
8	MW-5	Selenium	0.024	0.010	2/13/14
9	MW-6	Selenium	0.011	0.010	9/15/11
10	MW-6	Selenium	0.014	0.010	9/24/12
11	MW-8	Selenium	0.015	0.010	10/28/13

49. As Table 3 shows, there have been eleven ~~violations~~exceedances of the open dumping MCL for selenium since monitoring began in late 2010.

COUNT 4

WATER POLLUTION AT JOLIET 29

50. Paragraphs 1-49 are realleged and incorporated herein by reference.

51. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Joliet 29, has discharged contaminants into the environment at Joliet 29 and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and D, there have been at least 156 violations of Illinois Class I Groundwater Quality Standards and at least 132 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

52. Since 2010, the groundwater at Joliet 29 has exceeded the Class I GQSs for antimony, boron, chloride, iron, manganese, sulfate, and TDS, and the Class II GQSs for boron, chloride, iron, sulfate, and TDS. *See* Exhibits B, C, and D.

COUNT 5

WATER POLLUTION AT POWERTON

53. Paragraphs 1-52 are realleged and incorporated herein by reference.

54. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Powerton, has discharged contaminants into the environment at Powerton and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and F, there have been at least 445 violations of Illinois Class I

Groundwater Quality Standards and at least 216 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

55. Since 2010, the groundwater at Powerton has exceeded the Class I GQSs for antimony, arsenic, boron, chloride, iron, manganese, nitrate, selenium, sulfate, thallium, and TDS, and the Class II GQSs for arsenic, boron, chloride, iron, manganese, selenium, sulfate, and TDS. *See* Exhibits B, C, and F.

COUNT 6

WATER POLLUTION AT WAUKEGAN

56. Paragraphs 1-55 are realleged and incorporated herein by reference.

57. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Waukegan, has discharged contaminants into the environment at Waukegan and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and H, there have been at least 155 violations of Illinois Class I Groundwater Quality Standards and 105 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

58. Since 2010, the groundwater at Waukegan has exceeded the Class I GQSs for antimony, arsenic, boron, chloride, iron, manganese, nitrate, selenium, pH, sulfate, and TDS, and the Class II GQSs for boron, chloride, iron, pH, selenium, sulfate, and TDS. *See* Exhibits B, C, and H.

COUNT 7

WATER POLLUTION AT WILL COUNTY

59. Paragraphs 1-58 are realleged and incorporated herein by reference.

60. MWG, through coal ash disposal ponds, landfills, unconsolidated coal ash fill, and/or other coal ash and coal combustion waste repositories at Will County, has discharged contaminants into the environment at Will County and thereby caused water pollution in violation of 415 ILCS 5/12(a) and (d), and 35 Ill. Admin. Code §§ 620.115, 620.301(a), and 620.405. As shown in Exhibits B, C, and J, there have been at least 297 violations of Illinois Class I Groundwater Quality Standards and at least 214 violations of Illinois Class II Groundwater Quality Standards since monitoring began in late 2010.

61. Since 2010, the groundwater at Will County has exceeded the Class I GQSs for antimony, arsenic, boron, chloride, manganese, pH, sulfate, and TDS, and the Class II GQSs for boron, chloride, pH, selenium, sulfate, and TDS. *See* Exhibits B, C, and J.

RELIEF REQUESTED

WHEREFORE, Petitioners request that this Board:

1. Declare that Respondent, Midwest Generation, LLC has violated the Illinois Environmental Protection Act's prohibitions on open dumping and groundwater pollution at its Joliet 29, Powerton, Waukegan, and Will County sites.
2. Impose civil penalties under 415 ILCS 5/42.
3. Order Respondent, under 415 ILCS 5/33, to:
    - Cease and desist from open dumping of coal ash and coal combustion waste and from causing or threatening to cause water pollution,
    - Modify its coal ash and coal combustion waste disposal and storage practices so as to avoid future groundwater contamination,
    - Remediate the contaminated groundwater so that it meets applicable Illinois groundwater standards; and

4. Grant such other relief as the Board deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Jennifer L. Cassel, hereby certify that a true copy of the foregoing **MOTION FOR LEAVE TO REPLY TO MIDWEST GENERATION LLC'S RESPONSE TO COMPLAINANTS' SECOND MOTIO NFOR LEAVE TO FILE AMENDED COMPLAINT** and **REPLY** were served via United States Mail, postage prepaid, in Chicago, Illinois on January 30, 2014 upon the service list below.

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