

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 2013-015
Complainants,)	(Enforcement – Water)
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondent.)	

NOTICE OF FILING

TO: Don Brown, Clerk	Attached Service List
Illinois Pollution Control Board	
60 E. Van Buren St., Ste. 630	
Chicago, Illinois 60605	

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board Respondent, Midwest Generation, LLC’s List Exhibits Offered for Admission and Submitted to the Illinois Pollution Control Board a copy of which is herewith served upon you.

MIDWEST GENERATION, LLC

By: /s/ Andrew Nishioka

Dated: June 28, 2023

Jennifer T. Nijman
Kristen L. Gale
Andrew Nishioka
NIJMAN FRANZETTI LLP
10 South LaSalle Street, Suite 3400 (please note new suite no.)
Chicago, IL 60603
(312) 251-5271

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MIDWEST GENERATION, LLC,)	
)	
Respondent.)	

LIST OF EXHIBITS OFFERED FOR ADMISSION BY MIDWEST GENERATION, LLC AND SUBMITTED TO THE ILLINOIS POLLUTION CONTROL BOARD

Pursuant to 35 Ill. Adm. Code 101.627, Respondent Midwest Generation, LLC, submits its list of exhibits offered during the May 15, 2023 to May 19, 2023 and June 12, 2023 to June 15, 2023 hearing for PCB 2013-15.

Exhibit	Description
MWG 1108	USEPA Presumptive Remedy for CERCLA Municipal Landfill, September 1993
MWG 1110	Water Quality Standards and Effluent Limitations for the Chicago Area Waterway System and Lower Des Plaines River, PCB R08-09, Sediment Chemistry Study (Pre-filed Testimony Dr. Burton), September 8, 2008
MWG 1111	Phase II Report, Brandon Road Interbasin Project, Kaskaskia Engineering 2022 (Army Corp of Engineers) (Excerpt)
MWG 1501	AS 2021-001, Midwest Generation LLC’s Petition for Adjusted Standard and Finding of Inapplicability for the Joliet 29 Station, May 11, 2021
MWG 1502	Federal CCR Compliance Annual Groundwater Monitoring and Corrective Action Report - 2021, Joliet #29 Generating Station
MWG 1503	Map of Boring Locations, Joliet #29, Figure 1
MWG 1504	Joliet 29 Boring Logs SB1-SB16
MWG 1505	Joliet 29 Boring Logs TW1-TW3
MWG 1506	Euofins Joliet 29 Soil Samples East Clarifier, West Clarifier Temporary Borings

Exhibit	Description
MWG 1507	Eurofins Joliet 29 Soil Samples
MWG 1508	Joliet 29 Inspection Summary Letter 2018
MWG 1509	Joliet 29 Inspection Summary Letter 2019
MWG 1510	Joliet 29 Inspection Summary Letter 2020
MWG 1511	Joliet 29 Inspection Summary Letter 2021
MWG 1512	Joliet 29 Inspection Summary Letter 2022
MWG 1513	KPRG 2021 Photos of J29 NE Area
MWG 1514	Powerton First Quarter 2015 Quarterly Report, April 24, 2015
MWG 1515	Illinois River Levels at Kingston Mines and Peoria Lock and Dam
MWG 1516	Illinois River Levels at Kingston Mines and Peoria Lock and Dam
MWG 1517	Eurofins LEAF tests for Waukegan Former Slag Area (FS Area)
MWG 1601	MWG Employee Information
MWG 1602	Lydersen, Kari, "Historic coal ash raises concerns at iconic Illinois coal plant site", Energy News, Dec. 21, 2021
MWG 1603	AS 2021-001, Recommendation of the IEPA, Joliet 29 Station, September 22, 2021
MWG 1604	AS 2021-001, Board Order, Adjusted Standard and Finding of Inapplicability for the Joliet 29 Station, May 18, 2023
MWG 1605	MWG's Response in Support of its Joliet 29 Petition for Adjusted Standard, PCB AS21-01, March 24, 2022
MWG 1606	AS 2021-002, Board Order, Adjusted Standard and Finding of Inapplicability for the Powerton Station, February 17, 2022
MWG 1607	Shealey Presentation for Testimony
MWG 1701	Expert Report on Relief and Remedy, <i>Sierra Club et al. v. Midwest Generation, LLC</i> , Weaver Consultants Group, April 2021
MWG 1702	Weaver Consulting Group Presentation for Testimony
MWG 1703	Email from J. Kunkel to F. Bugel and A. Russ attaching Meeting Minutes of meeting between J. Kunkel and F. Bugel, Aug. 20, 2014
MWG 1801	Dr. Brian Richards CV
MWG 1802	Economic Impacts of Midwest Generation Stations in Illinois, Prepared by Brian Richard, Ph.D., April 2021
MWG 1901	Expert Report <i>In the Matter of Sierra Club, Environmental Law and Policy Center, et al v. Midwest Generation, LLC</i> , PCB13-15, Prepared by Gayle Koch, April 2021 (Contains NDI – hard copies submitted)
MWG 1902	Gayle Koch Presentation for Testimony (Contains NDI – hard copies submitted)

I certify that an accurate reproduction of the exhibits contained in the foregoing List of Exhibits Offered for Admission and Submitted to the Illinois Pollution Control Board was submitted to the Illinois Pollution Control Board, Don Brown on June 28, 2023 as required by 35 Ill. Adm. Code 101.677(c).

/s/ Andrew Nishioka
MIDWEST GENERATION, LLC

Dated: June 28, 2023

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing, Respondent, Midwest Generation, LLC's List Exhibits Offered for Admission and Submitted to the Illinois Pollution Control Board, and an accurate electronic reproduction of each exhibit was hand-delivered on June 28, 2023 with the following:

Don Brown, Clerk
Illinois Pollution Control Board
James R. Thompson Center
60 E. Van Buren St., Ste. 630
Chicago, Illinois 60605

and that true hard copies of the Non-Disclosable exhibits were hand-delivered to Don Brown on June 28, 2023. The Notice of Filing and Midwest Generation, LLC's List Exhibits Offered for Admission and Submitted to the Illinois Pollution Control Board was emailed to the parties listed on the foregoing Service List.

/s/ Andrew Nishioka