

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **SECOND AMENDED LIST OF COMPLAINTANTS' EXHIBITS OFFERED AT HEARING**, copies of which are served on you along with this notice.

Respectfully submitted,



Lindsay Dubin
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
(312) 795-3726

Dated: November 16, 2017

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)	
)	PCB No-2013-015
Complainants,)	(Enforcement – Water)
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondent)	

SECOND AMENDED LIST OF COMPLAINANTS' EXHIBITS OFFERED AT HEARING

The following exhibits were either admitted into evidence or were accepted as an offer of proof during the October 23-October 27, 2017 hearing in PCB No. 2013-15.

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Maria Race

Ex#	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 1A	MWG13-15	328	332	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Waukegan Generating Station, (June 11, 2012)	Y
Comp. Ex. 2A	MWG13-15	333	341	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Will County Generating Station, (June 11, 2012)	Y
Comp. Ex. 3A	MWG13-15	342	347	Joliet Notice of Violation (June 11, 2012)	Y

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Comp. Ex. 4A	MWG13-15	348	358	Illinois Environmental Protection Agency, Violation Notice: Midwest Generation, LLC, Powerton Generating Station, (June 11, 2012)	Y
Comp. Ex. 5.5	Interrogatory			MWG's Response to Complainants Fourth Set of Document Requests, Second Set of Interrogatories, and Second Set of Requests for Admission to Respondents (Mar. 31, 2015)	Y
Comp. Ex. 6	Interrogatory			MWG's Supplemental Response to Complainants Second Set of Interrogatories (June. 10, 2015)	Y
Comp. Ex. 7	Interrogatory			MWG's Supplemental Response to Complainants First Set of Interrogatories	Y
Comp. Ex. 8B	MWG13-15	364	383	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice --MWG response to the Joliet NOV, Jul. 27, 2012	Y
Comp. Ex. 9B	MWG13-15	384	406	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice 6282--MWG response to Powerton NOV, Jul. 27, 2012	Y
Comp. Ex. 10B	MWG13-15	407	420	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice --MWG response to the Waukegan NOV, Jul. 27, 2012	Y

Comp. Ex. 11B	MWG13-15	421	437	Letter from Susan M. Franzetti, Counsel for Midwest Generation, LLC, to Andrea Rhodes, Illinois Environmental Protection Agency, Re: Violation Notice --MWG response to the Will County NOV, Jul. 27, 2012	Y
Comp. Ex. 12C	MWG13-15	6964	7080	Patrick Engineering, Joliet Patrick Hydrogeological Assessment Report, (2011)	Y
Comp. Ex. 13C	MWG13-15	7081	7147	Patrick Engineering, Powerton Hydrogeologic Assessment Report, (Feb. 2011)	Y
Comp. Ex. 14C	MWG13-15	7148	7229	Patrick Engineering, Hydrogeological Assessment Report -- Waukegan, 2011	Y
Comp. Ex. 15C	MWG13-15	7230	7340	Patrick Engineering, Hydrogeological Assessment Report -- Will County, (2011)	Y
Comp Ex. 16	MWG13-15	14157	14173	Email from Richard Frenndt to Maria Race (Feb. 10, 2012)	Y
Comp. Ex. 17D	MWG13-15	3253	3644	ENSR Consulting, Phase II Environmental Site Assessment of the ComEd Powerton Generating Station, Route 29 & Mantino Road, Pekin, Illinois, (1998)	Y
Comp. Ex. 18D	MWG13-15	5699	6039	ENSR Consulting, Phase II Environmental Site Assessment of the ComEd Will County Generating Station, (1998)	Y
Comp. Ex. 19D	MWG13-15	45779	46054	ENSR Phase II Environmental Site Assessment Waukegan Generating Station (as an ancient document)	Y
Comp. Ex. 20D	MWG13-15	23301	23597	ENSR, Phase II Environmental Site Assessment for Joliet 29 (Dec. 1998).	Y
Comp. Ex. 21	MWG13-15	25139	25167	ENSR, Phase I Environmental Site Assessment for Joliet 29 (Oct. 1998).	Y

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Comp. Ex. 22	MWG13-15	13734	13736	Email from Eric J. Tlachac to Maria Race (Oct. 24, 2007)	Y
Comp. Ex. 23	MWG13-15	21746	21750	Letter from Amy Hanrahan to Andrea Rhodes, Illinois EPA, Well Installation Documentation, Powerton (Dec. 14, 2012)	Y
Comp. Ex. 24E	MWG13-15	4044	4082	Powerton Bypass Cleaning Basin, 2012 quarter 1	Y
Comp. Ex. 24.5	MWG13-15	39530	39675	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2012 Powerton Generating Station- Ash Impoundment (July 30, 2012)	Y
Comp. Ex. 25E	MWG13-15	38471	38523	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011 Joliet #29 Generating Station- Ash Impoundment Bates Comp. 000131-000183 (Aug. 1, 2011)	Y
Comp. Ex. 26E	MWG13-15	39620	39646	Patrick Engineering, Quarterly Groundwater Monitoring Results – First Quarter 2011, Powerton Generating Station – Ash Impoundment (Apr. 18, 2011)	Y
Comp. Ex. 27E	MWG13-15	40005	40044	Patrick Engineering Inc., Quarterly Groundwater Monitoring Results, Third Quarter 2011, Powerton Generating Station –Bypass Cleaning Basin (See also Bates Comp. 4088-4127)	Y
Comp. Ex. 28E	MWG13-15	40589	40629	Patrick Engineering, Groundwater Monitoring Results – April 2012, Powerton Generating Station – Metal Cleaning Basin (May 17, 2012) (See also Bates Comp. 001019-001059)	Y
Comp. Ex. 29E	MWG13-15	41609	41671	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth	Y

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				Quarter 2012 Waukegan Generating Station- Ash Impoundments (Jan. 16, 2013) (See also Bates Comp. 001929-002000)	
Comp. Ex. 30E	MWG13-15	42345	42394	Patrick Engineering, Quarterly Groundwater Monitoring Results – Second Quarter 2011, Will County Generating Station – Ash Impoundment (Aug. 1, 2011) (See also Bates Comp. 000348-000397)	Y
Comp. Ex. 30.5E	MWG13-15	40045	40104	Patrick Engineering, Quarterly Groundwater Monitoring Results – Fourth Quarter 2011, Powerton Generating Station – Bypass Cleaning Basin (Jan. 18, 2012) (See also Bates Comp. 000626-000666)	Y
Comp. Ex. 31	MWG13-15	14225	14269	Email from Richard Frenndt to Maria Race Aug. 9, 2012)	Y
Comp. Ex. 32	MWG13-15	13746	13746	Email from Jeffrey Shuh to Maria Race	Y
Comp. Ex. 33	MWG13-15	9668	9731	Midwest Generation, Application for Permit or Construction Approval, Secondary Ash Settling Basin Liner Replacement -- Powerton Station, (Dec. 22, 2009)	Y
Comp. Ex. 34	MWG13-15	23608	23617	NRT, Technical Memorandum No. 1, Impoundment Ranking and Replacement Liner Recommendations (Dec. 1, 2005).	Y
Comp. Ex. 35	MWG13-15	16277	16278	Email from Bill Buscher at IEPA to Maria Race (Oct. 26, 2011)	Offer of Proof
Comp. Ex. 36	MWG13-15	14096	14101	Email Exchange Re "Data tables for Ash Pond Investigations"	Y
Comp. Ex. 37	MWG13-15	818	819	Unsigned Letter from Maria Race to Lynn Dunaway	Offer of Proof

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Comp. Ex. 38	MWG13-15	12003	12040	ENSR, Phase I Environmental Site Assessment of the ComEd Waukegan Generating Station, (Oct. 1998)	Y
Comp. Ex. 39F	MWG13-15	5114	5136	Waukegan ELUC, Annual Groundwater Monitoring Report--July 2013	Y
Comp. Ex. 40F	MWG13-15	11924	11954	RETEC, Semiannual Groundwater Monitoring Report-December 2003, Environmental Land Use Control Implementation, Waukegan Generating Station (Jan. 16, 2004)	Y
Comp. Ex. 41F	MWG13-15	46113	46122	Andrews Environmental Engineering, Inc., Former Griess Pflieger Tannery Site, (Nov. 8, 2005)	Y
Comp. Ex. 42F	MWG13-15	46194	46201	Waukegan ELUC report, June 6, 2002	Y
Comp. Ex. 43	MWG13-15	44982		Email from Maria Race about Waukegan (July 26. 2017)	Y
Comp. Ex. 44	MWG13-15	44615	44615	Email from Maria Race to Lynn Dunaway (Aug. 28, 2014)	Y
Comp. Ex. 45	MWG13-15	29832	29836	Letter from John Ortiz, Leak Location Services, Inc., to Craig Holthaus, Otto Baum Company, Inc., re: leak location survey at Powerton (3/21/2011).	Offer of Proof
Comp. Ex. 46	MWG13-15	37981	37983	Patrick Engineering, IEPA meeting minutes, Maria Race in attendance, 5/5/2010.	Y
Comp. Ex. 47	MWG13-15	37979	37980	IEPA Meeting minutes, Maria Race in attendance, 5/5/2010.	Offer or Proof
Comp. Ex. 48	MWG13-15	13737	13742	Email Exchange Re "Will County South Ash Pond Liner Design Status"	Y

**Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony
of Christopher Lux**

Exhibit #	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 100	MWG13-15	49272	49285	Letter from Michael Smith to Christopher Lux (May 29, 2015)	Y
Comp. Ex. 102	MWG13-15	11572	11577	2007 work order to excavate and clean East Ash Pond to expose liner for repair	Y
Comp. Ex. 103	MWG13-15	44621	44621	Email, from C. Lux to Wayne Ollila (Oct. 30, 2014)	Y
Comp. Ex. 104	MWG13-15	44623	44623	Email from Chris Lux to Mike Smith (May 27, 2014)	Y
Comp. Ex. 105	MWG13-15	49286	49292	Email Exchange Re: NRG Waukegan Station West & East Ash Pond Liner Repairs (Mar. 21, 2015)	Y
Comp. Ex. 106	MWG13-15	44588	44589	Email about Ash Dumping on Station Property, (Sept. 12, 2014)	Y
Comp. Ex. 107	MWG13-15	22023	22023	Email from William Gaynor to Amy Hanrahan and others, 4/9/2013.	Y
Comp. Ex. 108	MWG13-15	22014	22018	Email Exchange Re "Powerton Secondary Ash Basin Relining" (Mar. 27, 2013)	Y
Comp. Ex. 109	MWG13-15	22765	22766	Email from William Gaynor to Charles J Hart and others, 9/24/2013.	Y

Comp. Ex. 110	MWG13-15	28031	28034	Email from Terry Kosmatka to Christopher lux and other, 9/13/2013.	Y
Comp. Ex. 112	MWG13-15	22020	22020	Email Exchange Re Ground Water Issues (Mar. 27, 2013)	Y

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Rebecca Maddox

Exhibit #	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 300	MWG13-15	27001	27001	Email from Jeffrey Beaudry to Aron Yakima and others, 7/17/2013.	Offer of Proof
Comp. Ex. 301	MWG13-15	48566	48567	Email from Rebecca Maddox to Yvonne Dedrickson (Sept. 1, 2010)	Y
Comp. Ex. 302	MWG13-15	28849	28851	Fax from Tedd Mills, Brieser Construction, to Beckie Maddox, 10/19/2009.	Y
Comp. Ex. 303	MWG13-15	28862	28863	Stormwater Construction Site Inspection Report signed by Beckie Maddox, 10/1/2009.	Y
Comp. Ex. 304	MWG13-15	48586	48586	Email from Rebecca Maddox to John Shields and Black Connolly (July 28, 2010)	Y
Comp. Ex. 305	MWG13-15	27130	27136	Email Exchange Re: Leak Location Survey for 2S Pond at MWGen - Will County	Offer of Proof
Comp. Ex. 306	MWG13-15	48612	48612	Email from Rebecca Maddox to Christopher Lux (Sept. 3, 2008)	Y

Comp. Ex. 307	MWG13-15	14177	14181	Email Exchange Re "3S Ash Pond Liner Damage-Will County"	Y
Comp. Ex. 309	MWG13-15	29589	29590	Letter from Donald Claybaugh to IEPA re: "IEMA incident" at Will County (12/11/2008).	Y
Comp. Ex. 311	MWG13-15	48568	48569	Email from Raymond Wolan to Rebecca Maddox and Daryl Miller (July 28, 2010)	Y

Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Richard Gnat

Exhibit #	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 201	MWG13-15	24264	24386	Letter from Richard Gnat, KPRG, to Maria Race re: Geotechnical Analysis of Soil Surrounding Settling Basins/Ponds (10/13/2005).	Y
Comp. Ex. 202	MWG13-15	24387	24392	Letter from Richard Gnat, KPRG, to Maria Race re: Re-Issuance of Figure 4-1 for Geotechnical Summary Report (Oct. 25, 2005).	Y
Comp. Ex. 203	MWG13-15	45648	45649	KPRG Boring Logs for MWs 8 and 9, Waukegan, (April 29, 2014)	Y
Comp. Ex. 204G	MWG13-15	58593	58615	TestAmerica Analytical Report, Joliet #29 (May 31, 2016)	Y
Comp. Ex. 205G	MWG13-15	58807	58831	Joliet lab results	Y

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Comp. Ex. 206G	MWG13-15	59021	59046	Joliet lab results	Y
Comp. Ex. 207G	MWG13-15	59778	59802	TestAmerica Analytical Report, Joliet# 29 (Feb. 25, 2016)	Y
Comp. Ex. 208G	MWG13-15	61575	61599	TestAmerica Analytical Reports 2017	Y
Comp. Ex. 209G	MWG13-15	61790	61813	Joliet lab results	Y
Comp. Ex. 210H	MWG13-15	58637	58675	Powerton lab results	Y
Comp. Ex. 211H	MWG13-15	58853	58893	Powerton lab results	Y
Comp. Ex. 212H	MWG13-15	59069	59107	Powerton lab results	Y
Comp. Ex. 213H	MWG13-15	59873	59909	Powerton lab results	Y
Comp. Ex. 214H	MWG13-15	61621	61662	Powerton lab results	Y
Comp. Ex. 215H	MWG13-15	61834	61873	Powerton lab results	Y
Comp. Ex. 216I	MWG13-15	45513	45538	TestAmerica Analytical Report (June 3, 2014)	Y
Comp. Ex. 217I	MWG13-15	45539	45562	Waukegan lab results	Y
Comp. Ex. 218I	MWG13-15	45592	45616	Waukegan lab results	Y
Comp. Ex. 219I	MWG13-15	62706	62725	Waukegan lab results	Y
Comp. Ex.	MWG13-15	62744	62767	Waukegan lab results	Y

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220I					
Comp. Ex. 222J	MWG13-15	58705	58733	Waukegan lab results	Y
Comp. Ex. 223J	MWG13-15	58921	58949	Waukegan lab results	Y
Comp. Ex. 224J	MWG13-15	59140	59168	Waukegan lab results	Y
Comp. Ex. 225J	MWG13-15	60113	60141	Waukegan lab results	Y
Comp. Ex. 226J	MWG13-15	60168	60196	Waukegan lab results	Y
Comp. Ex. 227J	MWG13-15	61693	61719	Waukegan lab results	Y
Comp. Ex. 228J	MWG13-15	61904	61930	Waukegan lab results	Y
Comp. Ex. 229K	MWG13-15	45563	45591	Waukegan tannery ELUC lab results	Y
Comp. Ex. 230K	MWG13-15	45617	45647	Waukegan tannery ELUC lab results	Y
Comp. Ex. 231K	MWG13-15	61443	61480	Waukegan ELUC data, 3/18, 5/18, and 9/13 2016	Y
Comp. Ex. 232K	MWG13-15	61481	61518	Waukegan tannery ELUC lab results	Y
Comp. Ex. 233K	MWG13-15	61519	61552	Waukegan tannery ELUC lab results	Y
Comp. Ex. 234K	MWG13-15	62653	62682	Waukegan tannery ELUC lab results	Y
Comp. Ex. 235K	MWG13-15	62789	62816	Waukegan tannery ELUC lab results	Y
Comp. Ex.	MWG13-15	61411	61442	TestAmerica Analytical	Y

235.5K				Report, Waukegan (Dec. 21, 2016)	
Comp. Ex. 236L	MWG13-15	58759	58783	Will County lab results	Y
Comp. Ex. 237L	MWG13-15	58973	58998	Will County lab results	Y
Comp. Ex. 238L	MWG13-15	59193	59217	Will County lab results	Y
Comp. Ex. 239L	MWG13-15	60015	60039	Will County lab results	Y
Comp. Ex. 240L	MWG13-15	61744	61767	Will County lab results	Y
Comp. Ex. 241L	MWG13-15	61955	61979	Will County lab results	Y
Comp. Ex. 242	MWG13-15	667	711	CCA - GMZ Application - Joliet	Y
Comp. Ex. 243M	Comp.	2475	2562	KPRG Associates, Quarterly Groundwater Monitoring Results – Second Quarter 2013 Joliet #29 Generating Station – Ash Impoundments. See also: Bates Comp. 002475-002562 (July 22, 2013)	Y
Comp. Ex. 244M	MWG13-15	49775	49838	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015 Joliet #29 Generating Station – Ash Impoundments (July 22, 2015)	Y
Comp. Ex. 245M	MWG13-15	58292	58388	NRG, Annual and Quarterly Groundwater Monitoring Report - Joliet #29 Generating Station, 4th	Y

				Quarter 2016 (Jan. 13, 2017)	
Comp. Ex. 246M	MWG13-15	62322	62386	Joliet groundwater report, April 2017	Y
Comp. Ex. 248N	MWG13-15	19442	19444	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2009, (Aug. 27, 2009)	Y
Comp. Ex. 249N	MWG13-15	19455	19459	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2010 (Aug. 27, 2010)	Y
Comp. Ex. 250N	MWG13-15	44153	44155	Letter from Richard Gnat to James DiCola, Inspection Summary Letter Aug. 22, 2011)	Y
Comp. Ex. 251N	MWG13-15	19470	19473	KPRG, Joliet #29 Former Ash Burial Area Runoff Inspection 2012, (Sept. 19, 2012)	Y
Comp. Ex. 253	MWG13-15	712	723	MWG Powerton ELUC Application, CCA	Y
Comp. Ex. 254	MWG13-15	724	775	CCA - GMZ Application - Powerton	Y
Comp. Ex. 255	MWG13-15	11235	11237	Letter from Richard Gnat to Lynn Dunaway, IEPA, Powerton Generating Station (Sept. 11, 2013)	Y
Comp. Ex. 256O	MWG13-15	4170	4323	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Powerton Generating Station – Ash Impoundments. See also:	Y

				Bates Comp. 002563-002716 (July 22, 2013)	
Comp. Ex. 2570	MWG13-15	49839	49966	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Powerton Generating Station – Ash Impoundments(July 22, 2015)	Y
Comp. Ex. 2580	MWG13-15	58155	58291	NRG, Annual and Quarterly Groundwater Monitoring Report - Powerton Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Y
Comp. Ex. 2590	MWG13-15	62216	62321	Powerton groundwater report, 2017 quarter 1	Y
Comp. Ex. 2600	MWG13-15	62535	62642	Powerton groundwater report, May 2017	Y
Comp. Ex. 261	MWG13-15	58588	58592	Powerton Generating Station - Metals Cleaning Basin Quarterly Groundwater Sampling Summary - 4th Quarter 2016 (Jan. 24, 2017)	Y
Comp. Ex. 263	MWG13-15	599	610	MWG Waukegan ELUC Application, CCA	Y
Comp. Ex. 264	MWG13-15	14524	14531	Waukegan Station New Wells and ELUC Information	Y
Comp. Ex. 265	MWG13-15	48439	48439	Table 1. Groundwater Elevations - Midwest Generation, LLC, Waukegan Station, Waukegan, IL Bates MWG13-15_48439	Offer of Proof

Comp. Ex. 267P	MWG13-15	43695	43848	Groundwater Monitoring Report, Waukegan, Third Quarter 2014 (2014)	Y
Comp. Ex. 268P	MWG13-15	45328	45416	NRG Energy, Annual and Quarterly Groundwater Monitoring Results – Fourth Quarter 2014 Waukegan Generating Station – Ash Impoundments (Jan. 22, 2015)	Y
Comp. Ex. 269P	MWG13-15	58490	58582	NRG, Annual and Quarterly Groundwater Monitoring Report - Waukegan Generating Station, 4th Quarter 2016 (Jan. 19, 2017)	Y
Comp. Ex. 270P	MWG13-15	62387	62468	Waukegan groundwater report, May 2017	Y
Comp. Ex. 271	MWG13-15	43849	43857	Groundwater data tables for Waukegan Wells MW-1 through MW-15 (various date ranges)	Y
Comp. Ex. 274	MWG13-15	12827	12845	Letter from Richard Gnat, Principal, KPRG and Associates, Inc. to Maria Race, re Liner Inspection- West and East Ash Pond at Waukegan Generation Station (Aug. 31, 2005) [Incomplete letter but attachments]	Y
Comp. Ex. 275	MWG13-15	594	598	Midwest Generation, Compliance Commitment Agreement-Well Installation Documentation, Waukegan Station, (Jan 15, 2013)	Y

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Comp. Ex. 276	MWG13-15	622	666	CCA - GMZ Application - Will County	Y
Comp. Ex. 278Q	MWG13-15	6670	6746	KPRG, Quarterly Groundwater Monitoring Results – Second Quarter 2013, Will County Generating Station – Ash Impoundments. Also: Bates Comp. 002773-002838 (July 22, 2013)	Y
Comp. Ex. 279Q	MWG13-15	49967	50028	NRG Energy, Quarterly Groundwater Monitoring Results – Second Quarter 2015, Will County Generating Station – Ash Impoundments (July 22, 2015)	Y
Comp. Ex. 280Q	MWG13-15	58389	58489	NRG, Annual and Quarterly Groundwater Monitoring Report - Will County Generating Station, 4th Quarter 2016 (Jan. 13, 2017)	Y
Comp. Ex. 281Q	MWG13-15	62469	62534	Will County groundwater report, May 2017	Y
Comp. Ex. 284	MWG13-15	49565	49652	KPRG, CCB Determination Support, Midwest Generation Will County Station (Sept. 8, 2015)	Y
Comp. Ex. 286	MWG13-15	14744	14747	Midland Standard Engineering & Testing, Inc., Laboratory Testing Services- Will County station (Aug. 22, 2012)	Y
Comp. Ex. 293	MWG13-15	19576	19668	KPRG, Reissued Joliet #29 Summary Report (Aug. 18.	Y

				2005)	
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Complainants' Exhibits Admitted or Accepted as an Offer of Proof During the Testimony of Dr. James Kunkel

Ex#	Comp/MWG	First	Last	Description	Admitted?
Comp. Ex. 100.5	MWG13-15	49285	49285	Waukegan Ash Pond Construction Diagrams	Y
Comp. Ex. 400				James Kunkel Resume/CV	Y
Comp. Ex. 401				James Kunkel expert reports: 7/1/15	Y
Comp. Ex. 403	Comp.	17473		EPRI 2012	Offer of Proof
Comp. Ex. 404	Comp.	17321	17472	EPRI 2010	Y
Comp. Ex. 405	Comp.	19067	19115	Illinois EPA technical support document (2013)	Y, taken under Admin. Notice
Comp. Ex. 407				James Kunkel expert reports 12/8/2015	Y
Comp. Ex. 408				James Kunkel expert reports 3/16/16	Y
Comp. Ex. 409				ASTM D3987-85 (1985)	Offer of Proof
Comp. Ex. 410				ASTM D3987-12	Offer of Proof
Comp. Ex. 411				James Kunkel Demonstrative Exhibits	Y

Respectfully submitted,



Lindsay Dubin
 Environmental Law & Policy Center
 35 E. Wacker Dr., Suite 1600
 Chicago, IL 60601
 ldubin@elpc.org

(312) 795-3726
*Attorney for ELPC, Sierra Club and
Prairie Rivers Network*

Faith E. Bugel
1004 Mohawk
Wilmette, IL 60091
(312) 282-9119
fbugel@gmail.com

Gregory E. Wannier
2101 Webster St., Ste. 1300
Oakland, CA 94612
(415) 977-5646
Greg.wannier@sierraclub.org

Attorneys for Sierra Club

Abel Russ
Attorney
Environmental Integrity Project
1000 Vermont Avenue NW
Washington, DC 20005
aruss@environmentalintegrity.org
802-482-5379

Attorney for Prairie Rivers Network

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)

Attorney for CARE

Dated: November 16, 2017

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **SECOND AMENDED LIST OF COMPLAINANTS' EXHIBITS OFFERED AT HEARING** was served electronically to all parties of record listed below, on November 16, 2017.

Respectfully submitted,



Lindsay Dubin
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
ldubin@elpc.org
(312) 795-3726

PCB 2013-015 SERVICE LIST:

Jennifer T. Nijman
Kristen L. Gale
NIJMAN FRANZETTI LLP
10 South LaSalle Street, Suite 3600
Chicago, IL 60603

Gregory E. Wannier
2101 Webster St., Ste. 1300
Oakland, CA 94612
(415) 977-5646
Greg.wannier@sierraclub.org

Bradley P. Halloran,
Hearing Officer
Illinois Pollution Control Board
100 West Randolph St., Suite 11-500
Chicago, IL 60601

Abel Russ
Attorney
Environmental Integrity Project
1000 Vermont Avenue NW
Washington, DC 20005
aruss@environmentalintegrity.org
(802) 662-7800 (phone)
(202) 296-8822 (fax)

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)

Faith E. Bugel
1004 Mohawk Wilmette, IL
60091
fbugel@gmail.com
(312) 282-9119 (phone)