

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, Assistant Clerk	Attached Service List
Illinois Pollution Control Board	
James R. Thompson Center	
100 West Randolph Street, Suite 11-500	
Chicago, IL 60601	

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board Respondent, Midwest Generation, LLC's Additional Demonstrative Exhibits, copies of which are hereby served upon you.

MIDWEST GENERATION, LLC

By: /s/ Jennifer T. Nijman

Dated: January 26, 2018

Jennifer T. Nijman
Susan M. Franzetti
Kristen L. Gale
NIJMAN FRANZETTI LLP
10 South LaSalle Street, Suite 3600
Chicago, IL 60603
(312) 251-5255

SERVICE LIST

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

Lindsay P. Dubin
Eric DeBellis and Jessica Dexter, also for Prairie
Rivers Network and Sierra Club
Environmental Law & Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601

Keith Harley
Chicago Legal Clinic, Inc.
211 West Wacker Drive, Suite 750
Chicago, IL 60606

Abel Russ
For Prairie Rivers Network
Environmental Integrity Project
1000 Vermont Avenue, Suite 1100
Washington, DC 20005

Faith E. Bugel
Attorney at Law
Sierra Club
1004 Mohawk
Wilmette, IL 60091

Greg Wannier, Associate Attorney
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing, Certificate of Service and Respondent, Midwest Generation, LLC's Additional Demonstrative Exhibits were filed electronically on January 26, 2018 with the following:

Don Brown, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

and that true copies were emailed on January 26, 2018 to the parties listed on the foregoing Service List.

/s/ Jennifer T. Nijman

Midwest Generation Power Stations

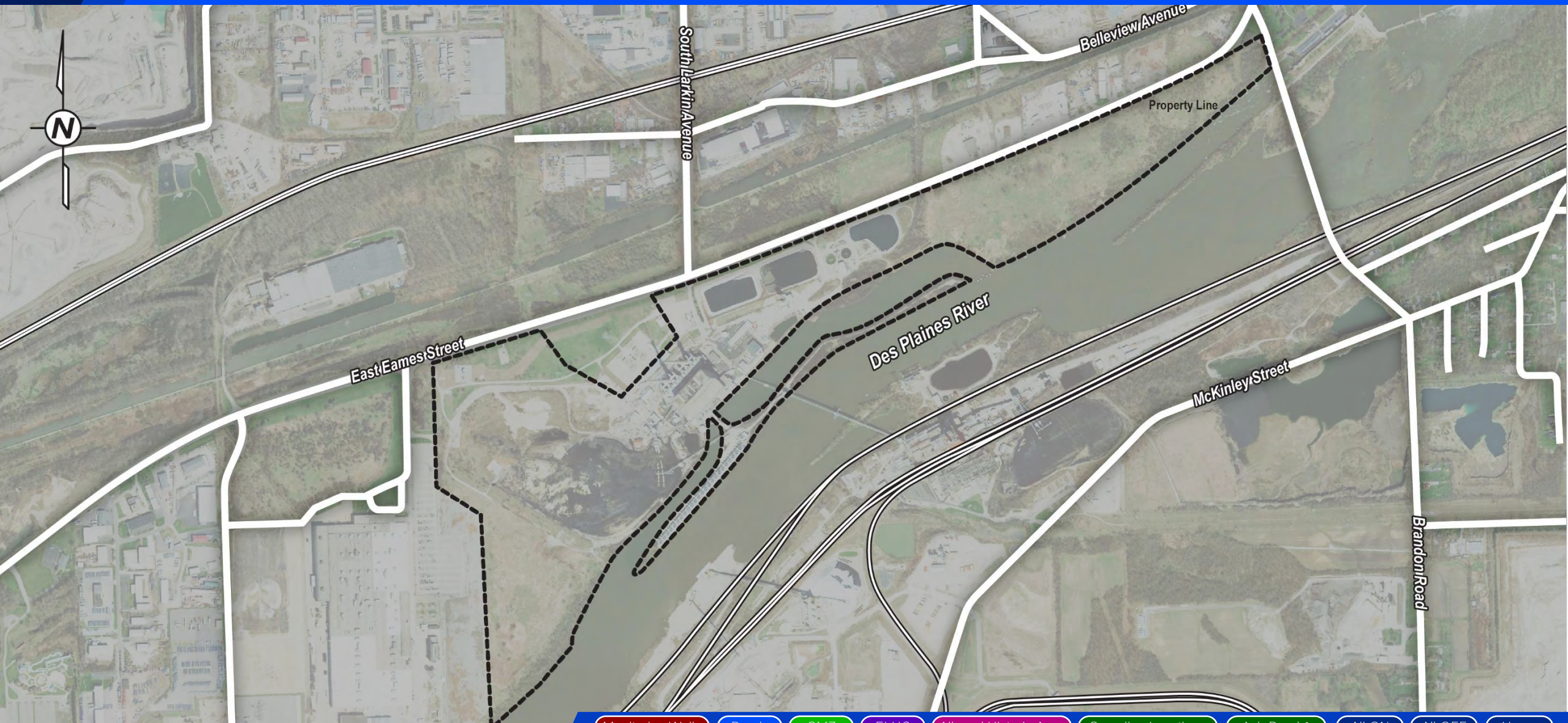
Joliet #29

Powerton

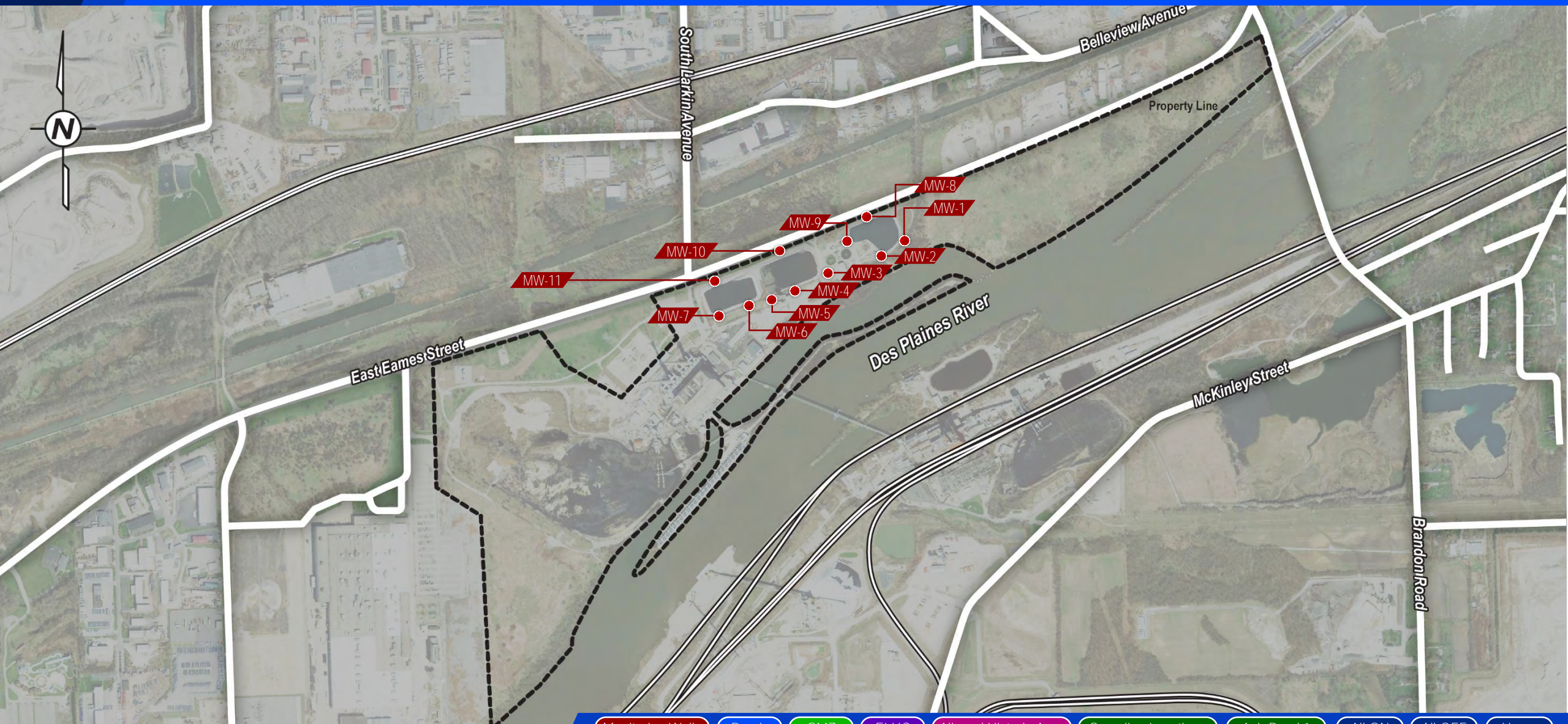
Waukegan

Will County

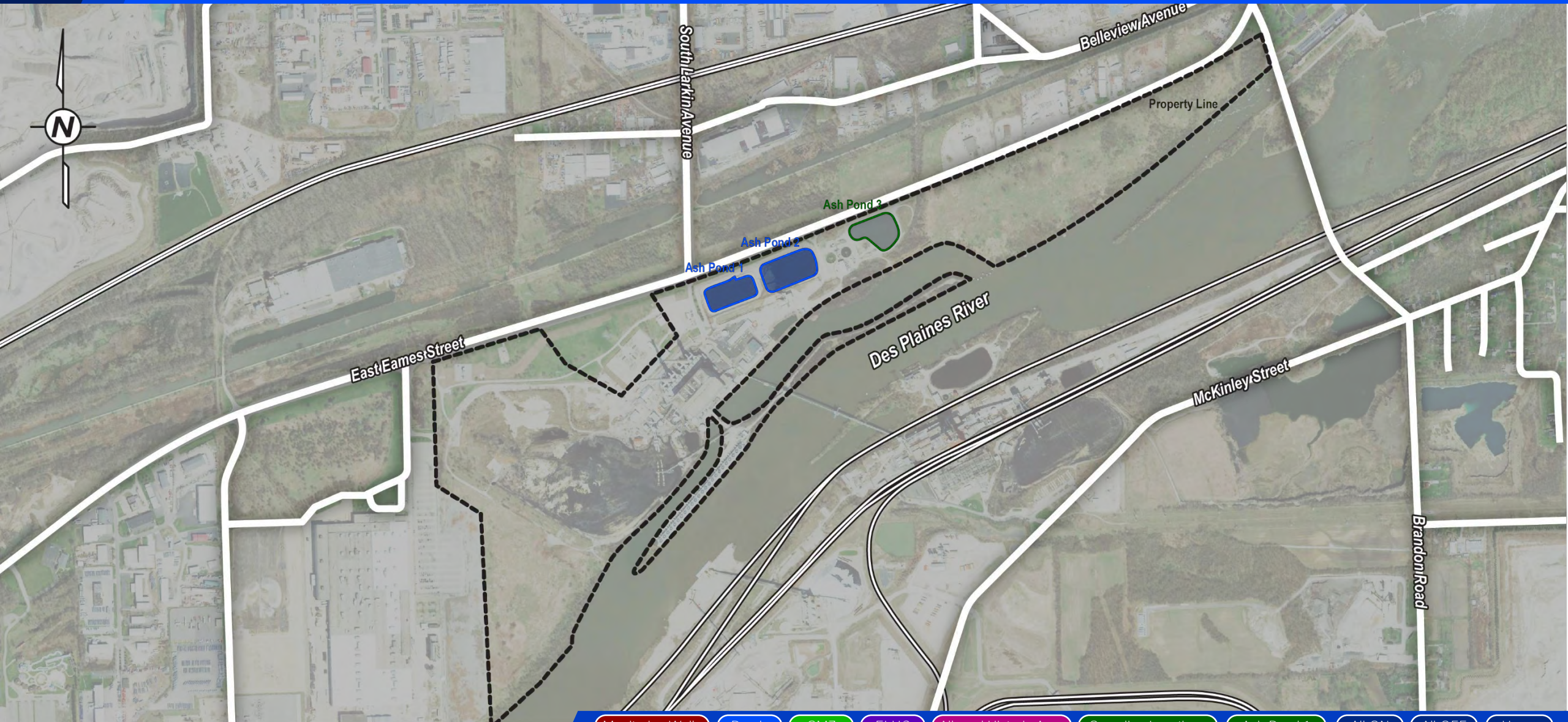
Joliet #29 Generating Station – Joliet, Illinois



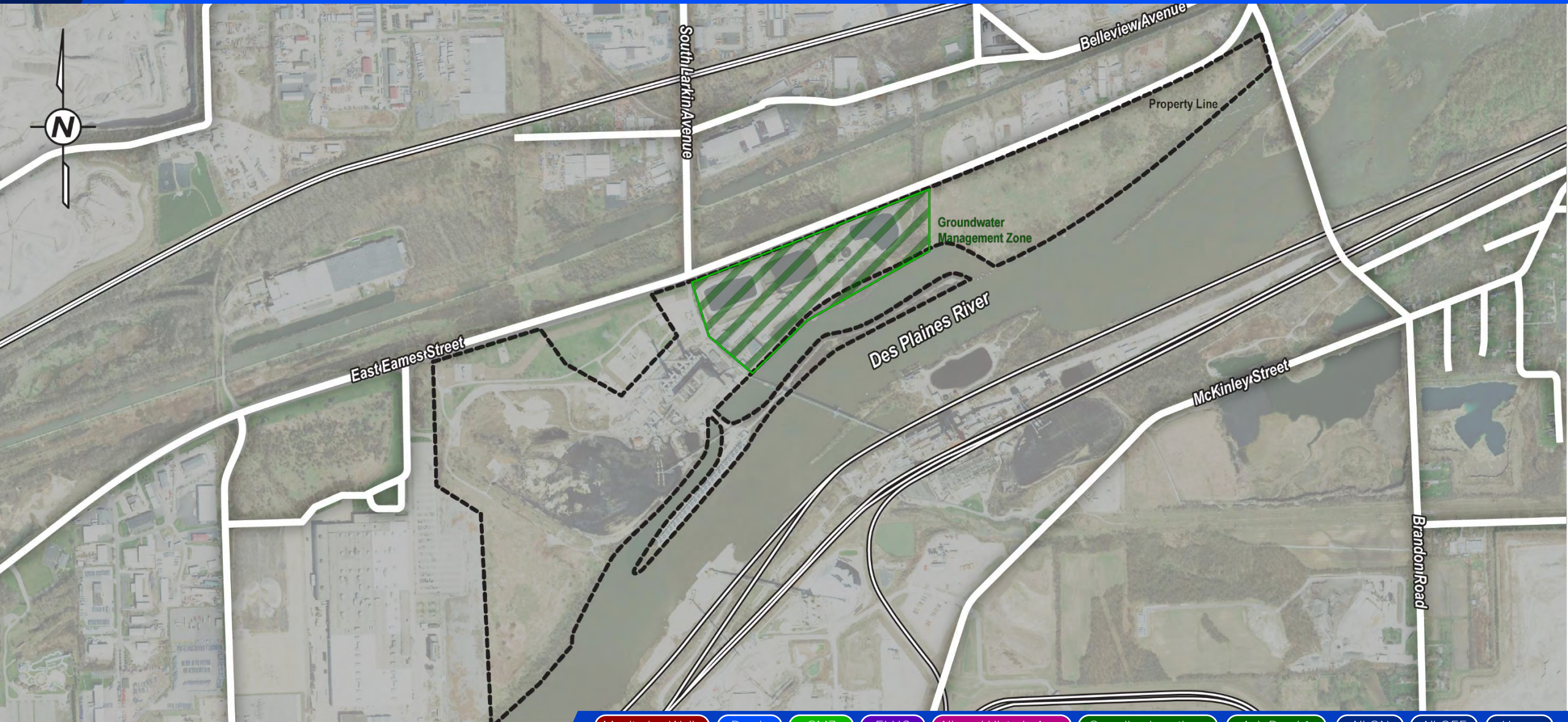
Joliet #29 Generating Station – Joliet, Illinois



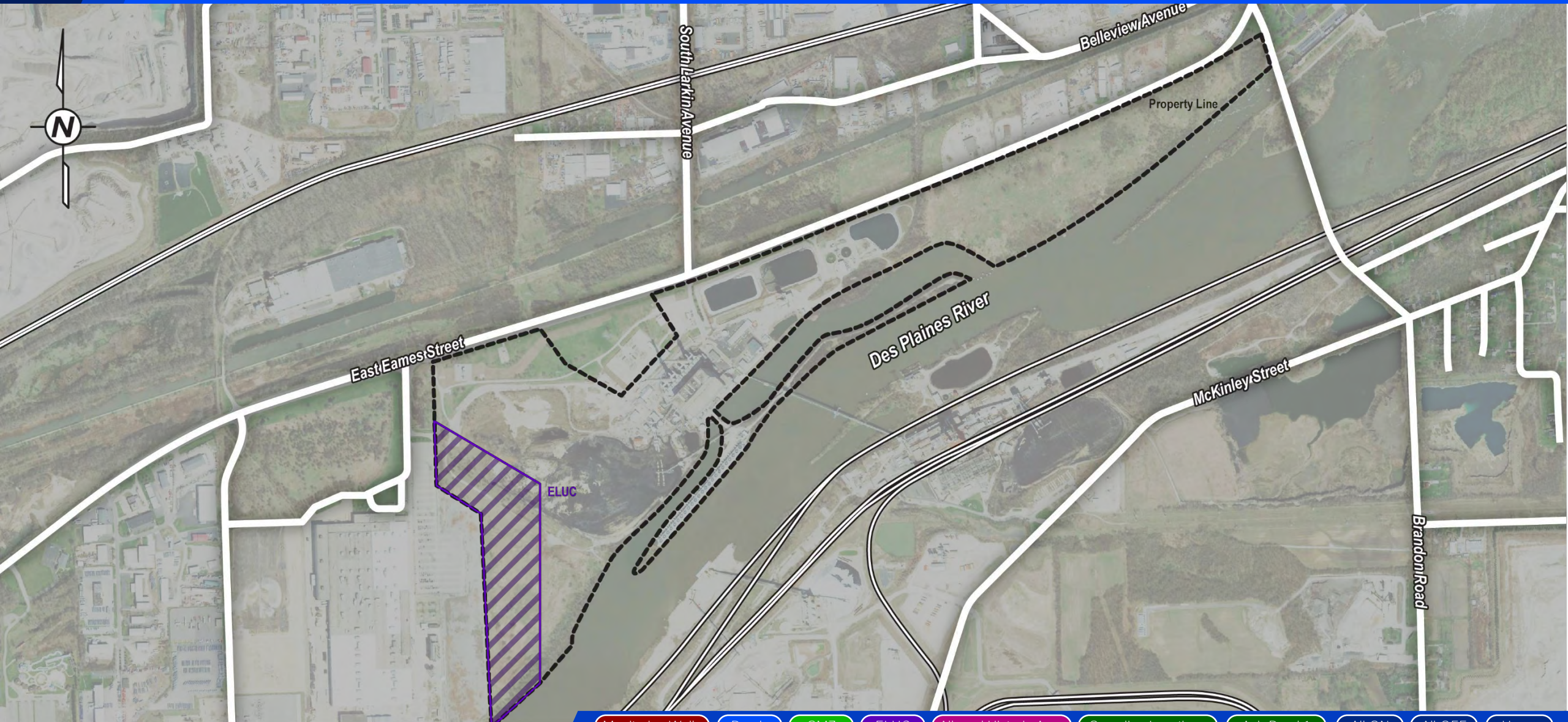
Joliet #29 Generating Station – Joliet, Illinois



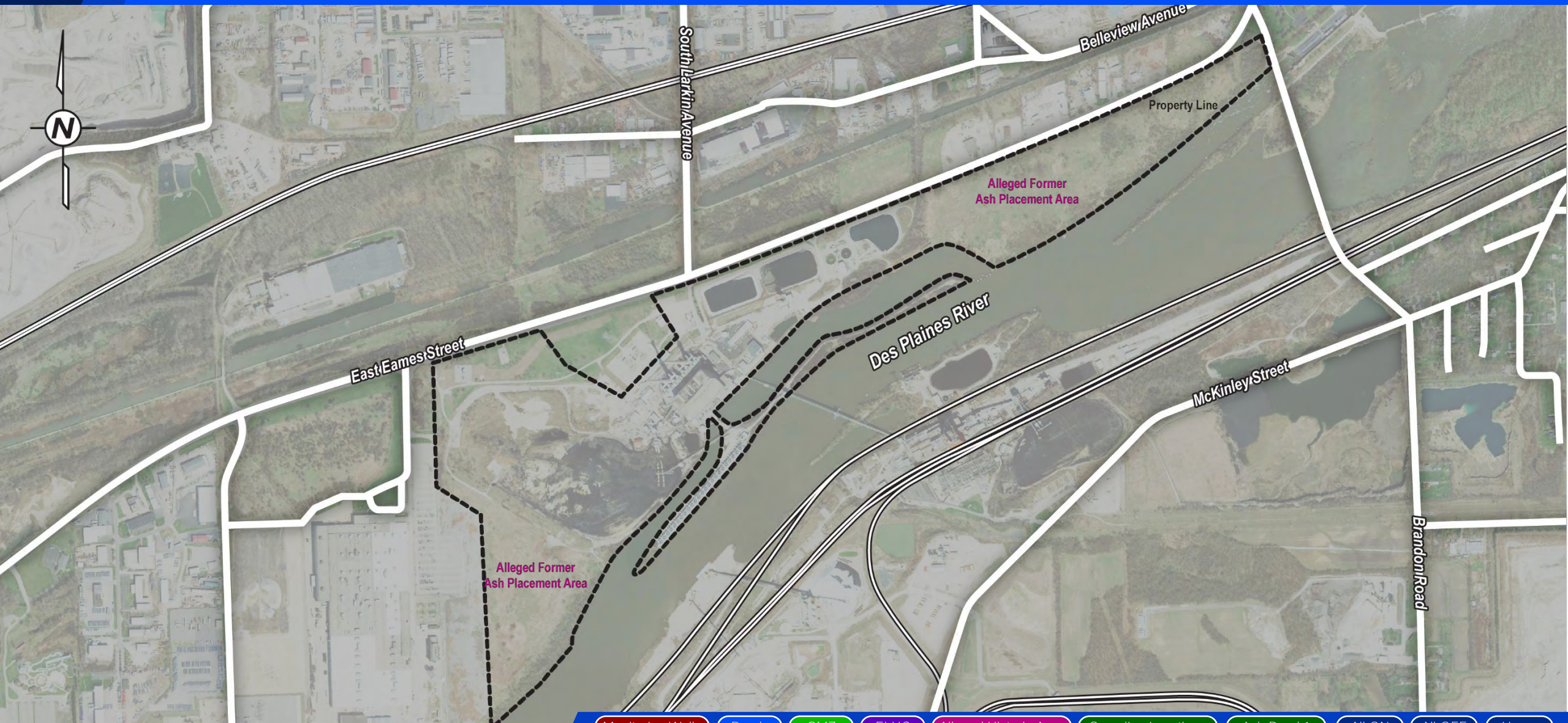
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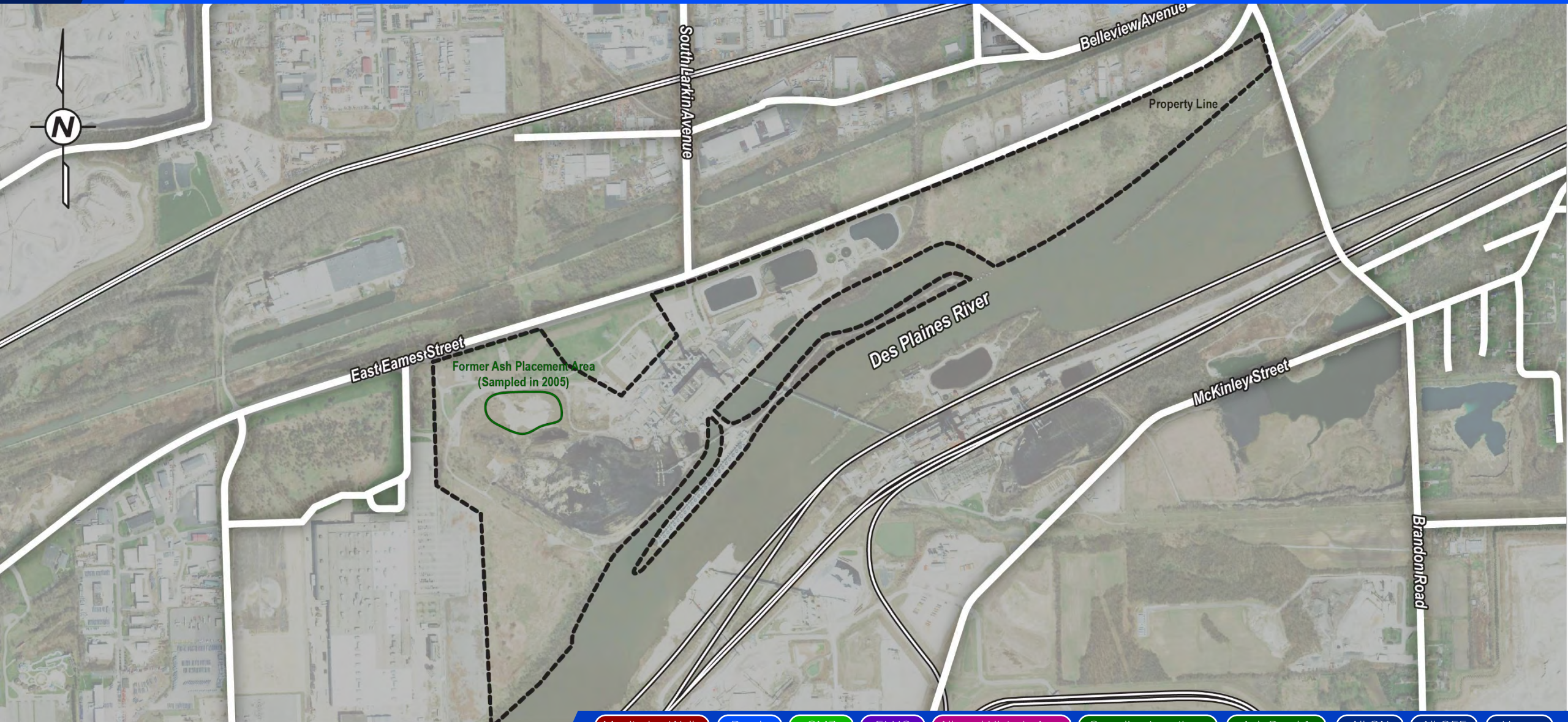
Joliet #29 Generating Station – Joliet, Illinois



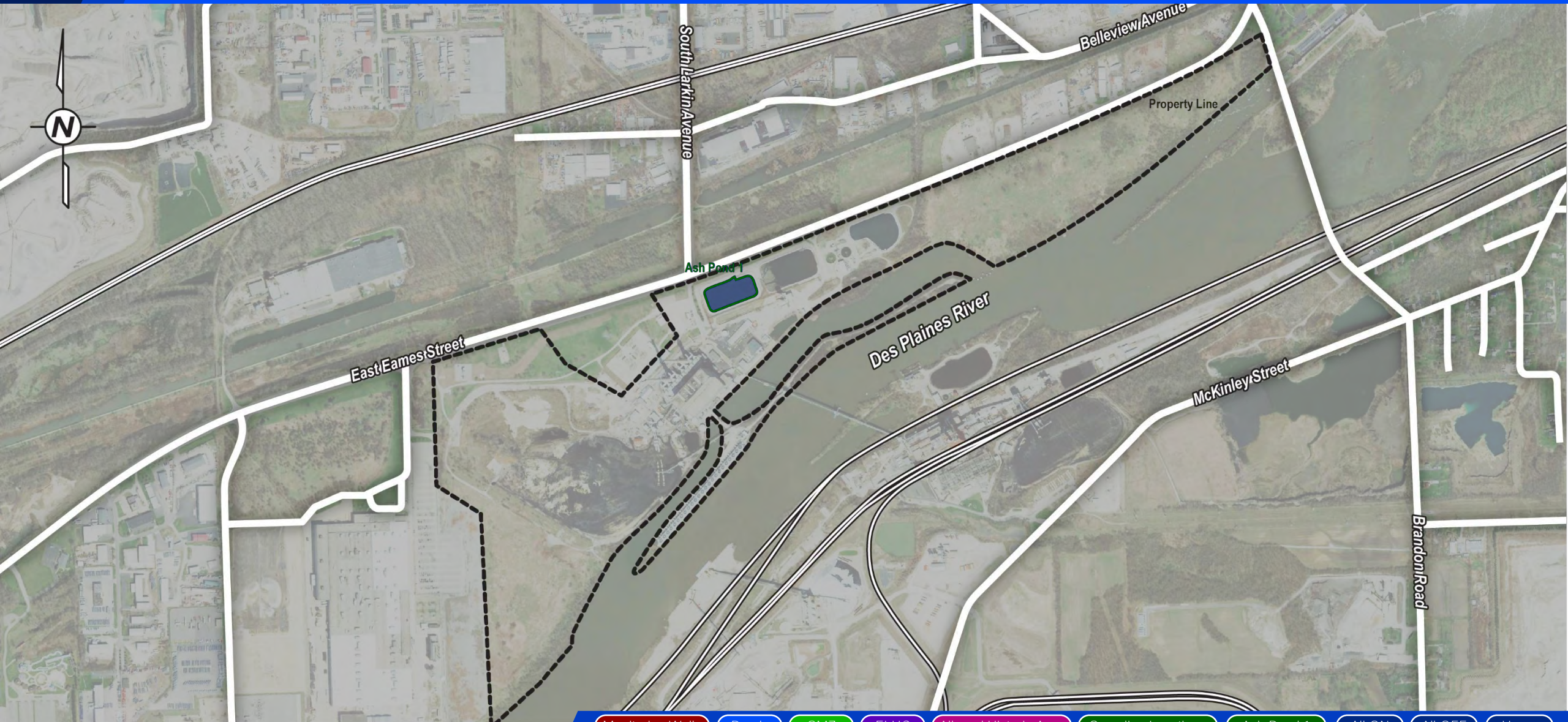
Joliet #29 Generating Station – Joliet, Illinois



Joliet #29 Generating Station – Joliet, Illinois



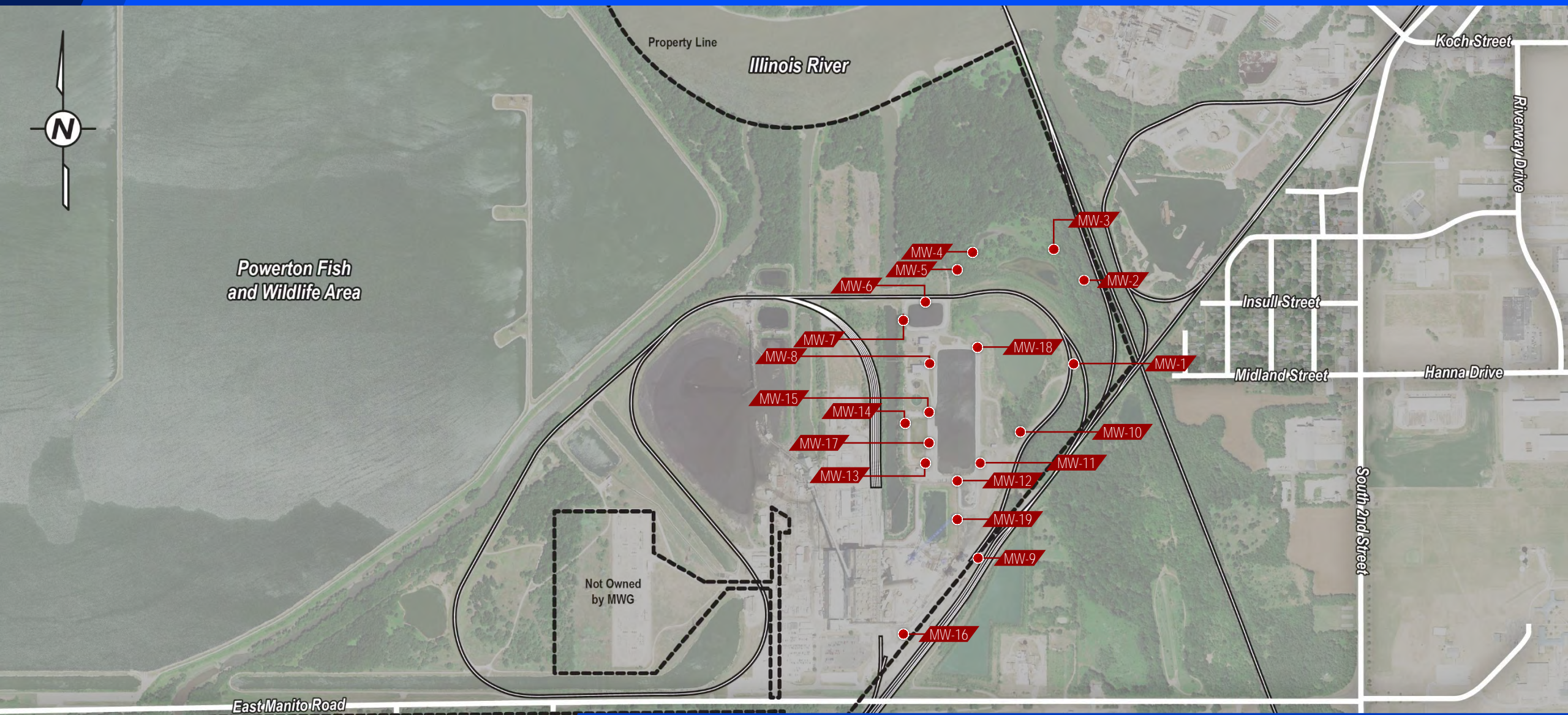
Joliet #29 Generating Station – Joliet, Illinois



Powerton Station – Pekin, Illinois



Powerton Station – Pekin, Illinois



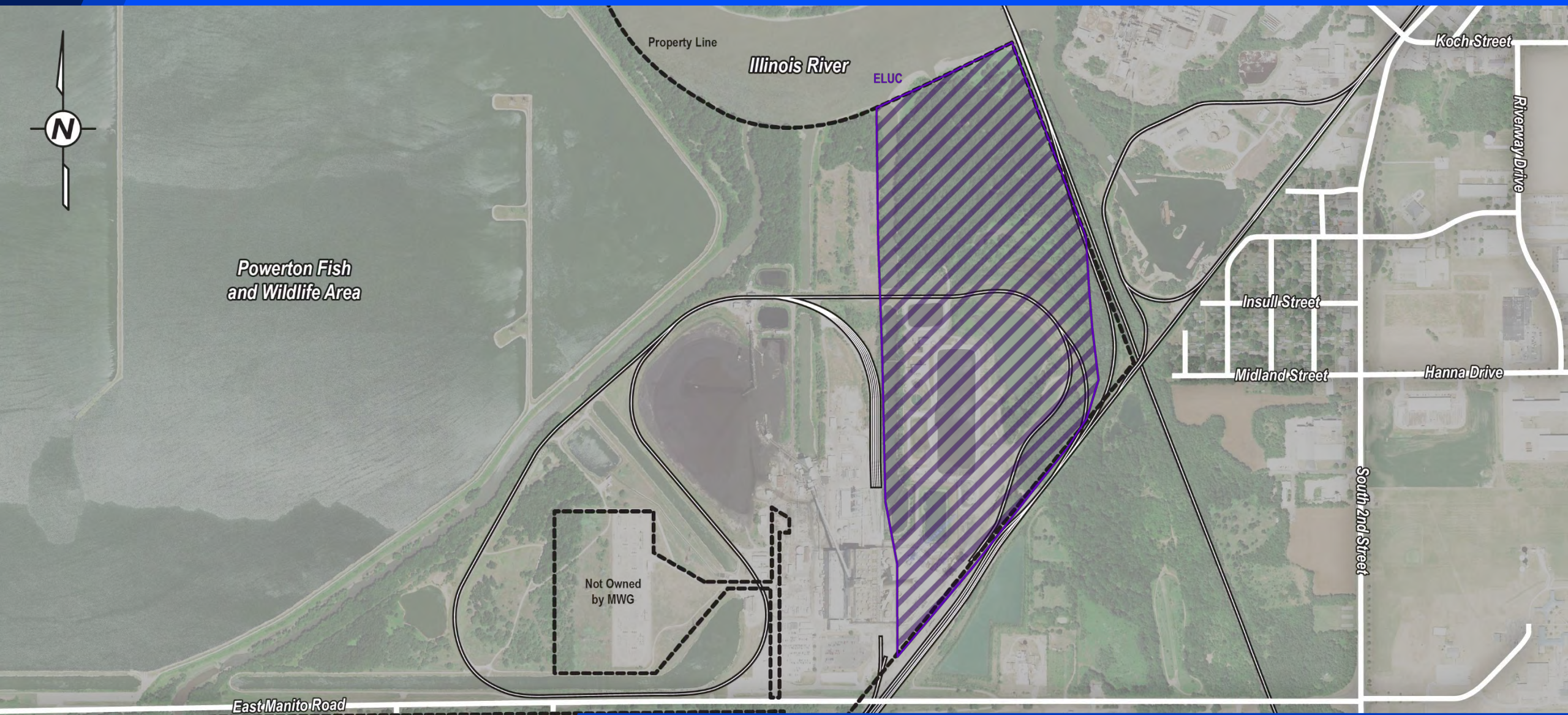
Powerton Station – Pekin, Illinois



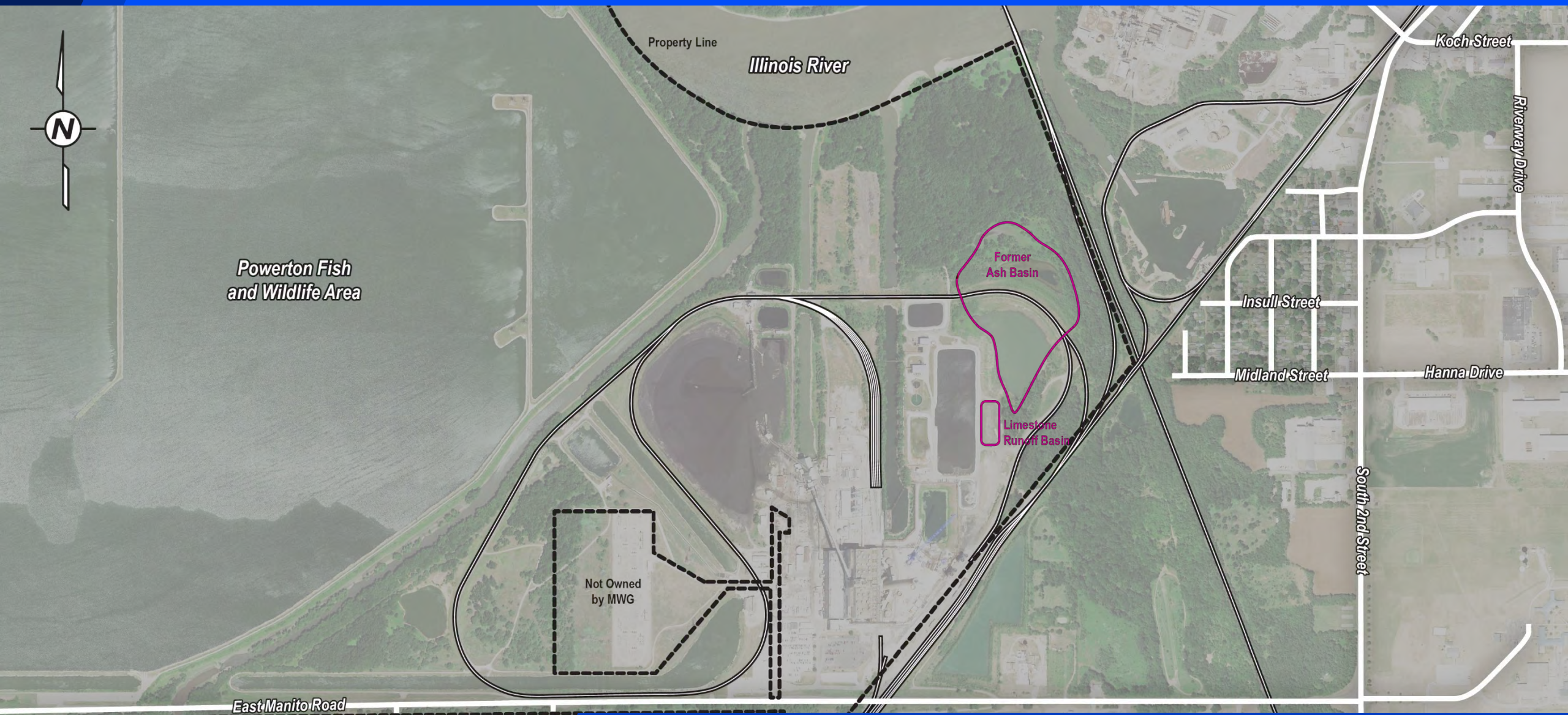
Powerton Station – Pekin, Illinois



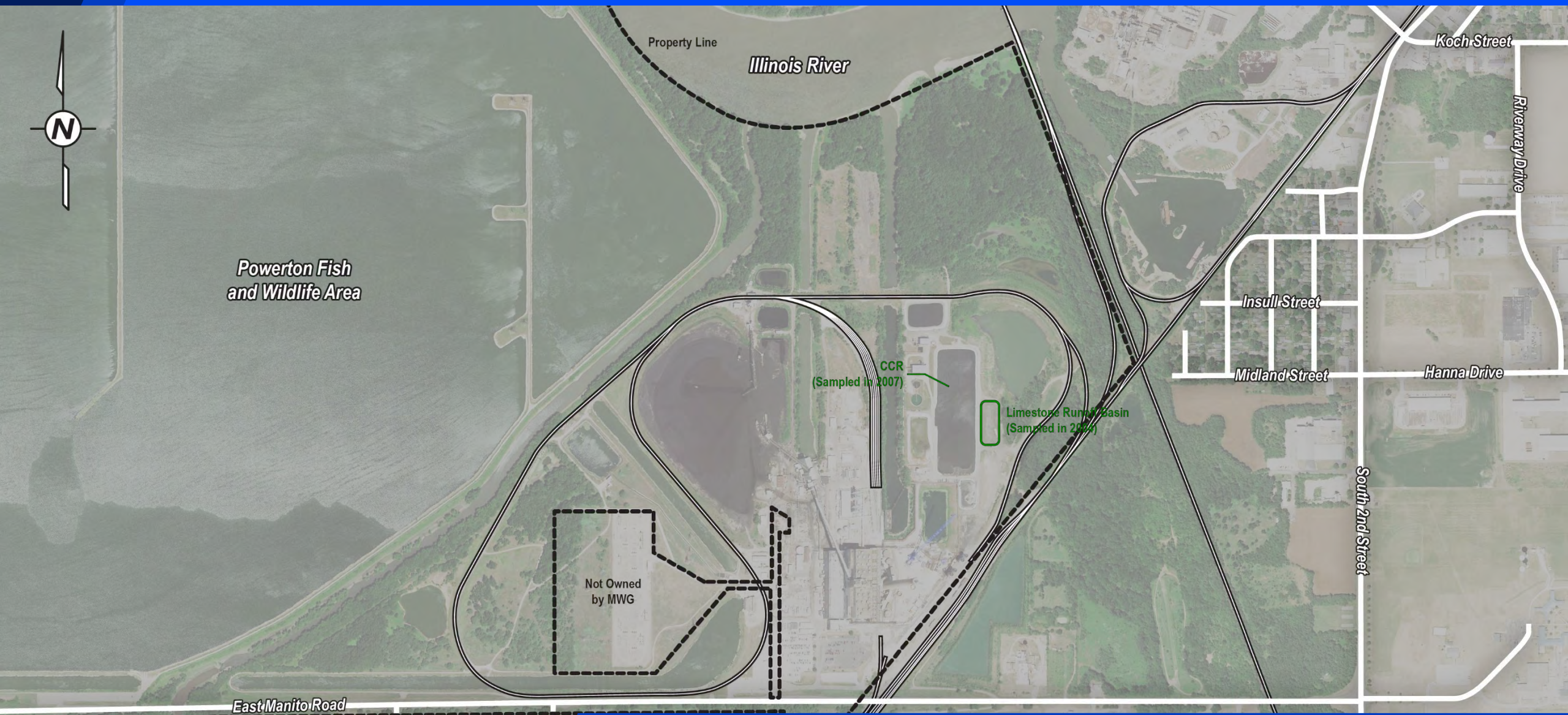
Powerton Station – Pekin, Illinois



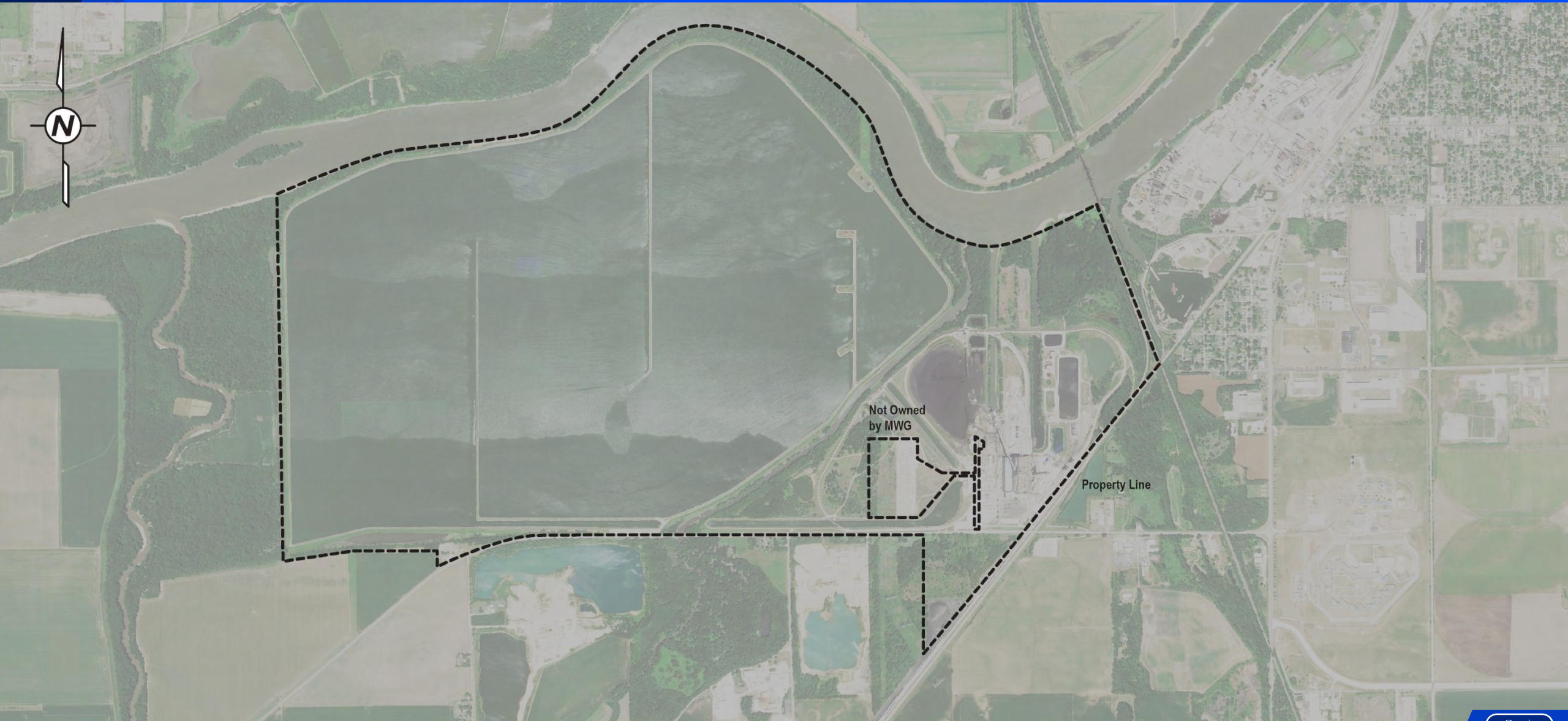
Powerton Station – Pekin, Illinois



Powerton Station – Pekin, Illinois



Powerton Station Property Line – Pekin, Illinois



Waukegan Station – Waukegan, Illinois



[Monitoring Wells](#)

[Ponds](#)

[GMZ](#)

[ELUC](#)

[Tannery ELUC](#)

[Alleged Historic Area](#)

[Sampling Locations](#)

[Neighboring Industry](#)

[All ON](#)

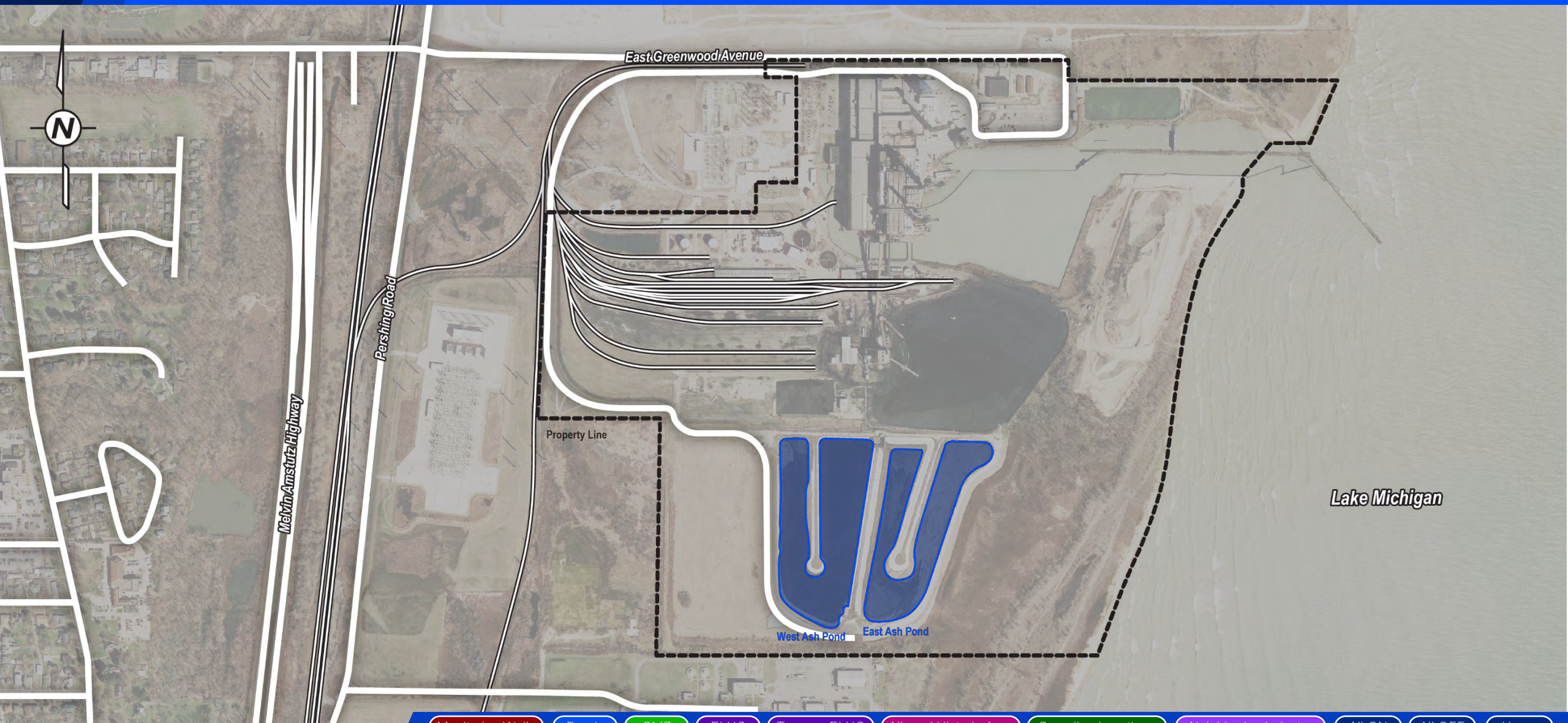
[All OFF](#)

[Home](#)

Waukegan Station – Waukegan, Illinois



Waukegan Station – Waukegan, Illinois



Monitoring Wells

Ponds

GMZ

ELUC

Tannery ELUC

Alleged Historic Area

Sampling Locations

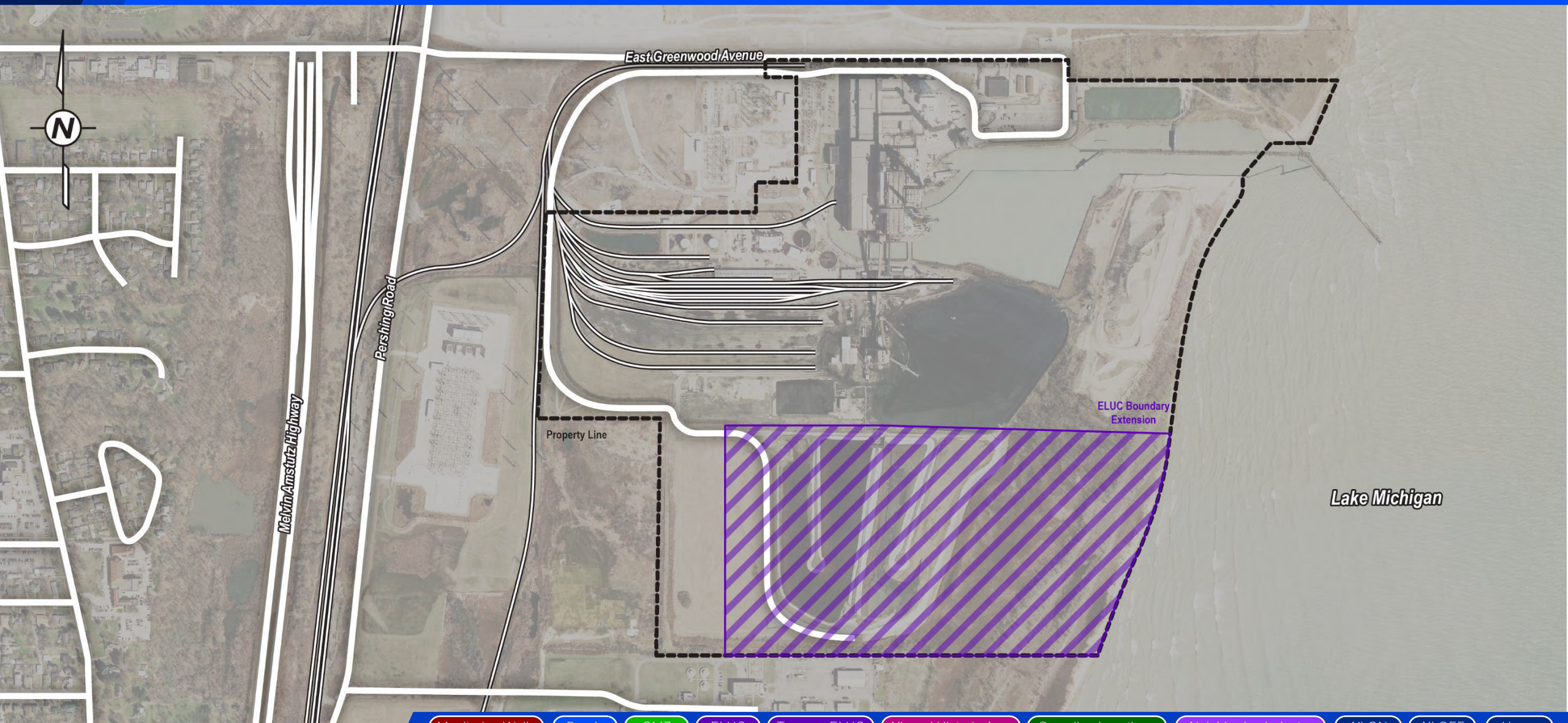
Neighboring Industry

All ON

All OFF

Home

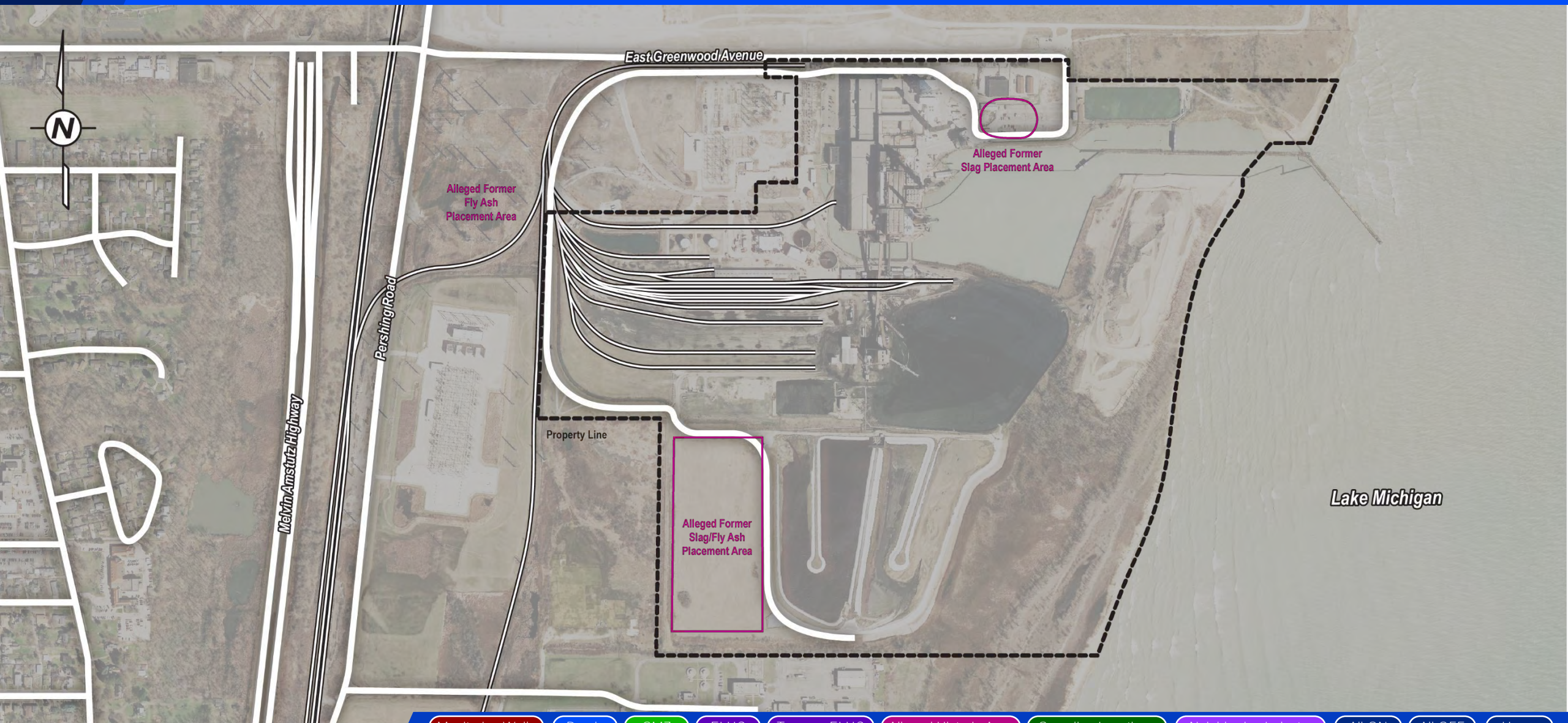
Waukegan Station – Waukegan, Illinois



Waukegan Station – Waukegan, Illinois



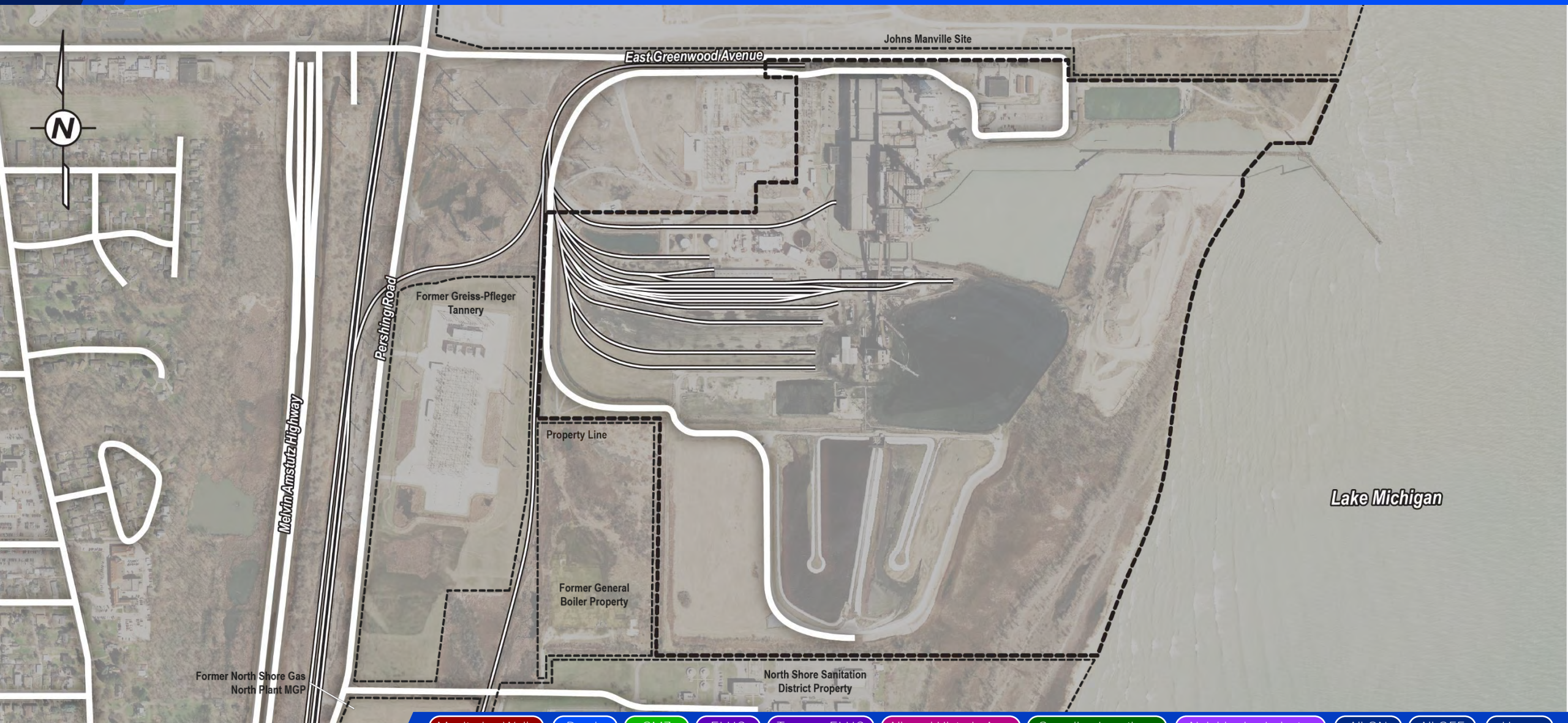
Waukegan Station – Waukegan, Illinois



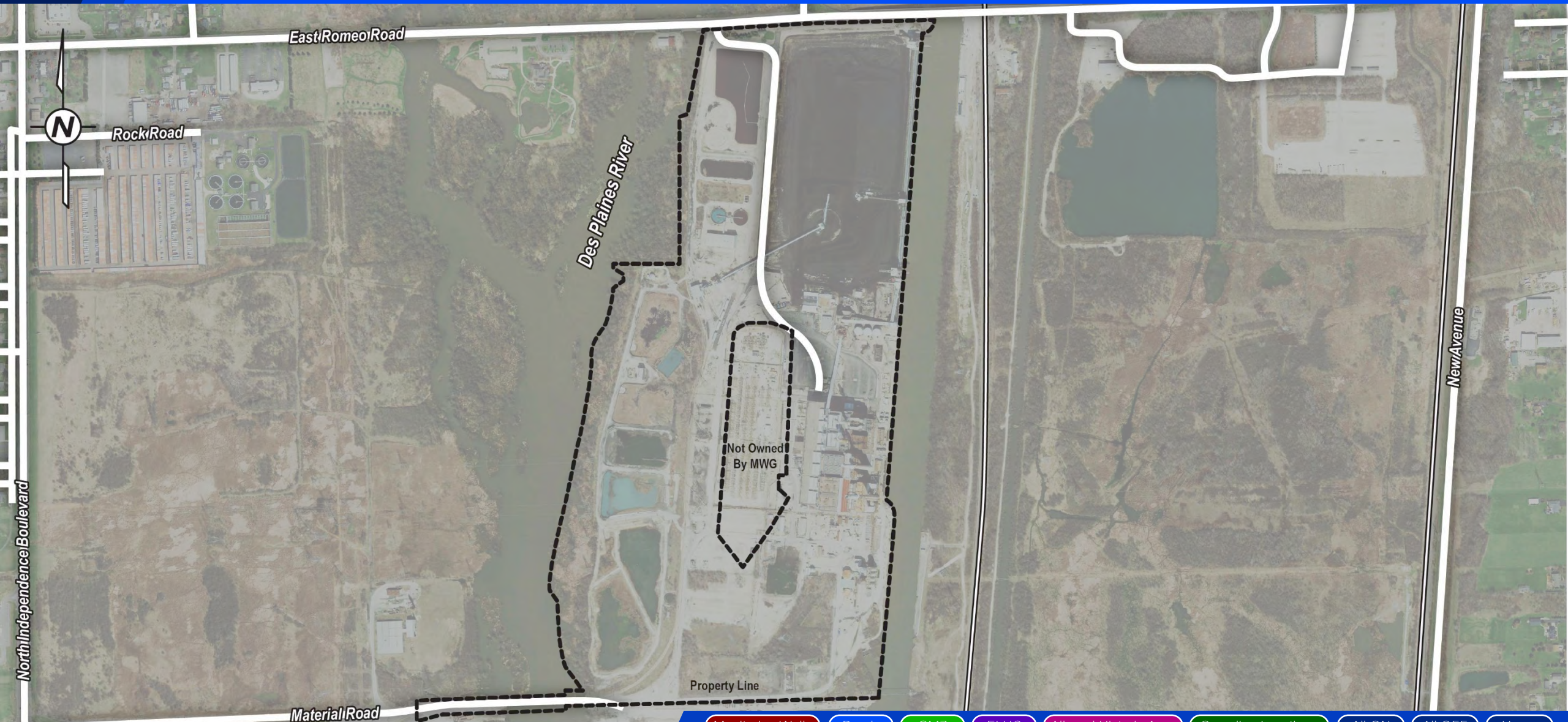
Waukegan Station – Waukegan, Illinois



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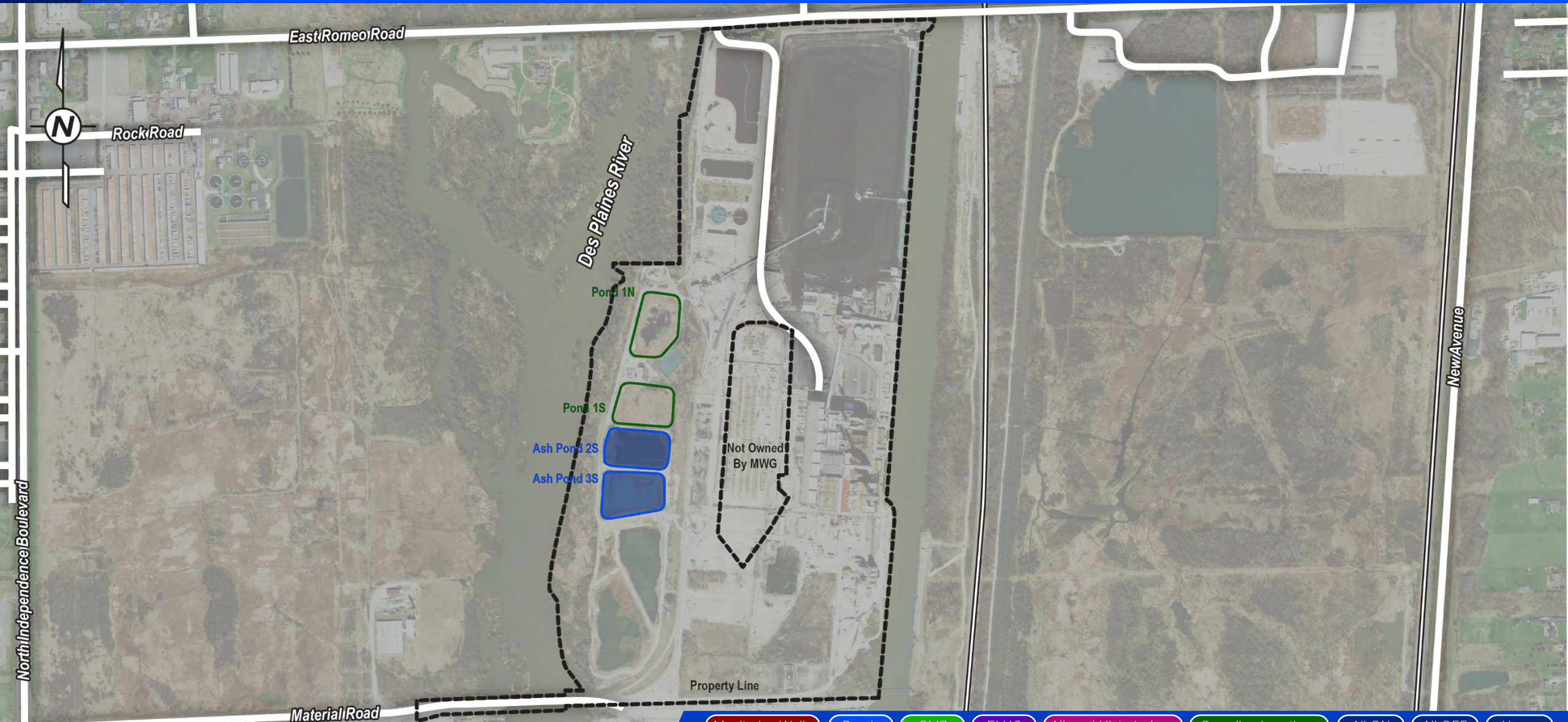
Will County Station – Romeoville, Illinois



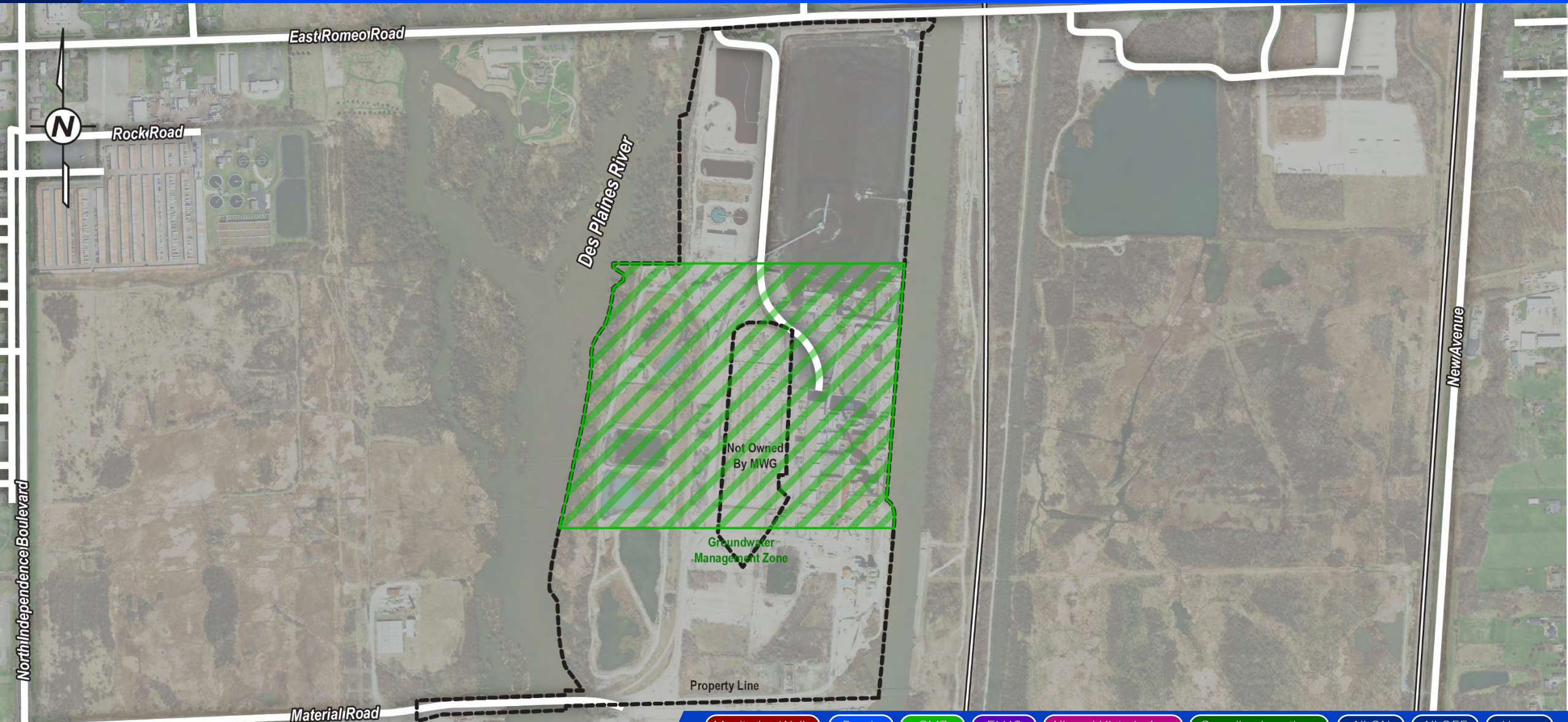
Will County Station – Romeoville, Illinois



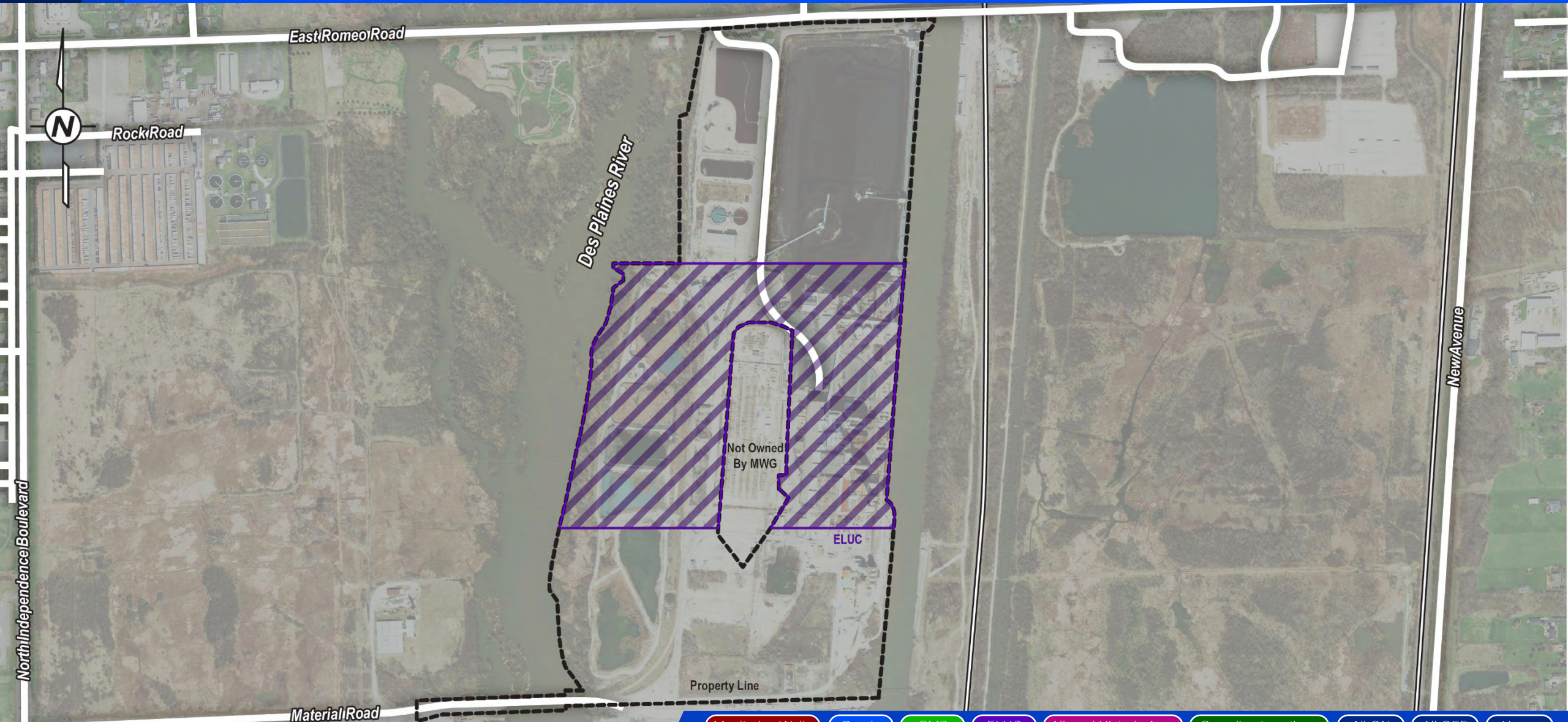
Will County Station – Romeoville, Illinois



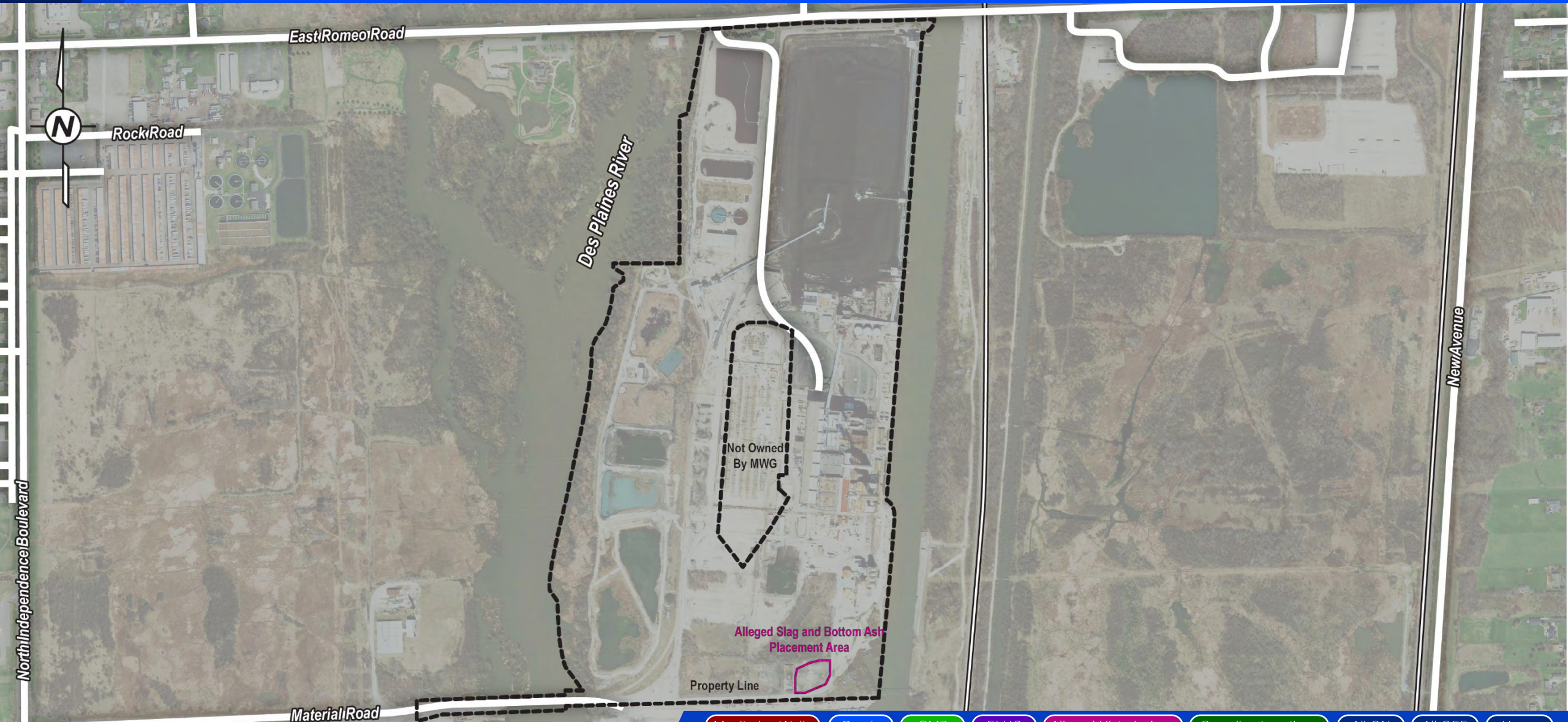
Will County Station – Romeoville, Illinois



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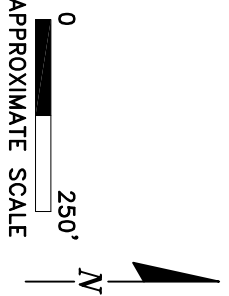
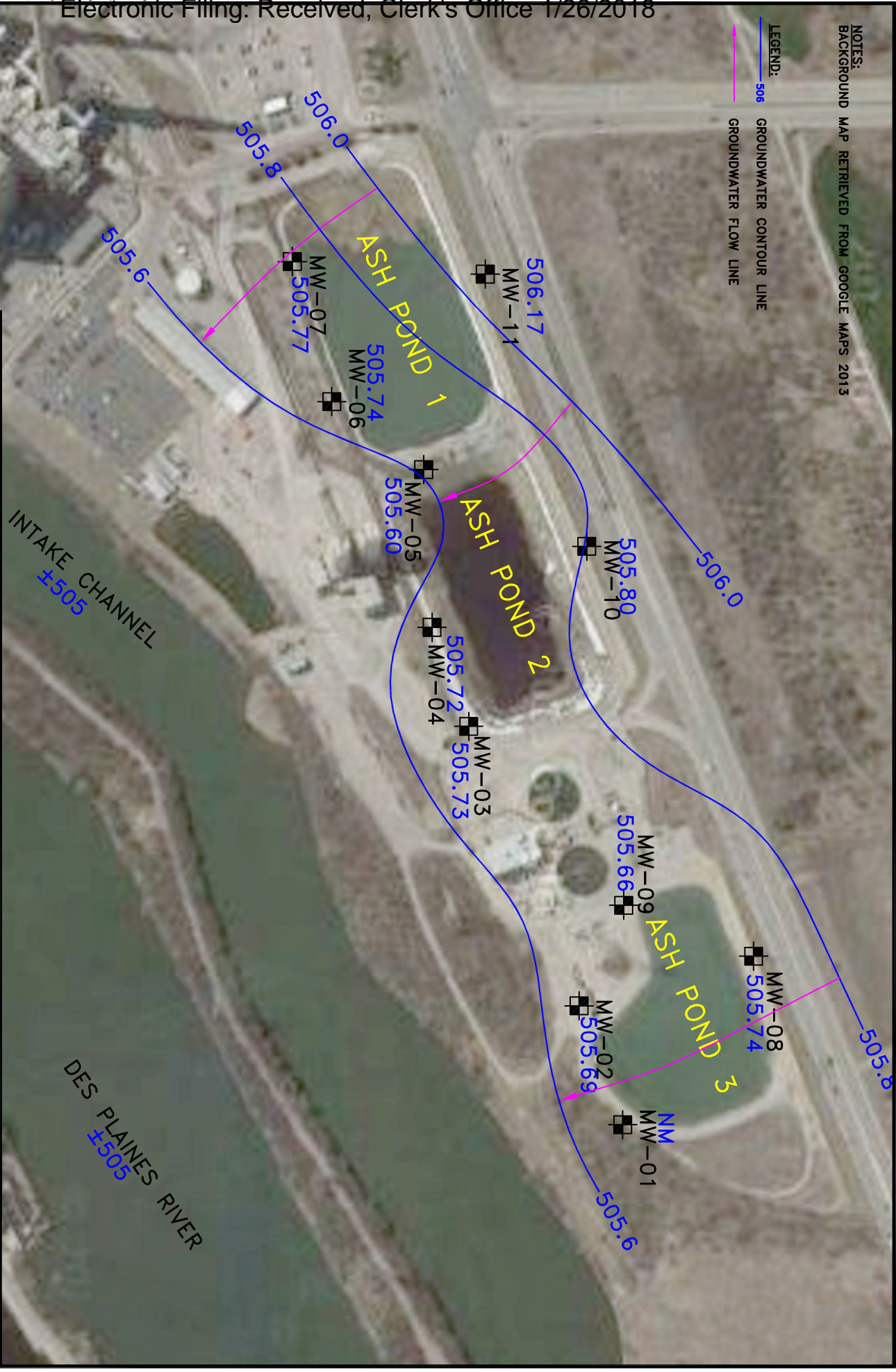
Will County Station – Romeoville, Illinois



NOTES:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2013

LEGEND:

- 506 GROUNDWATER CONTOUR LINE
- GROUNDWATER FLOW LINE



ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, Inc.

14685 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478
 414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

GROUNDWATER CONTOUR MAP 04/2017

JOLIET #29 GENERATING STATION
JOLIET, ILLINOIS

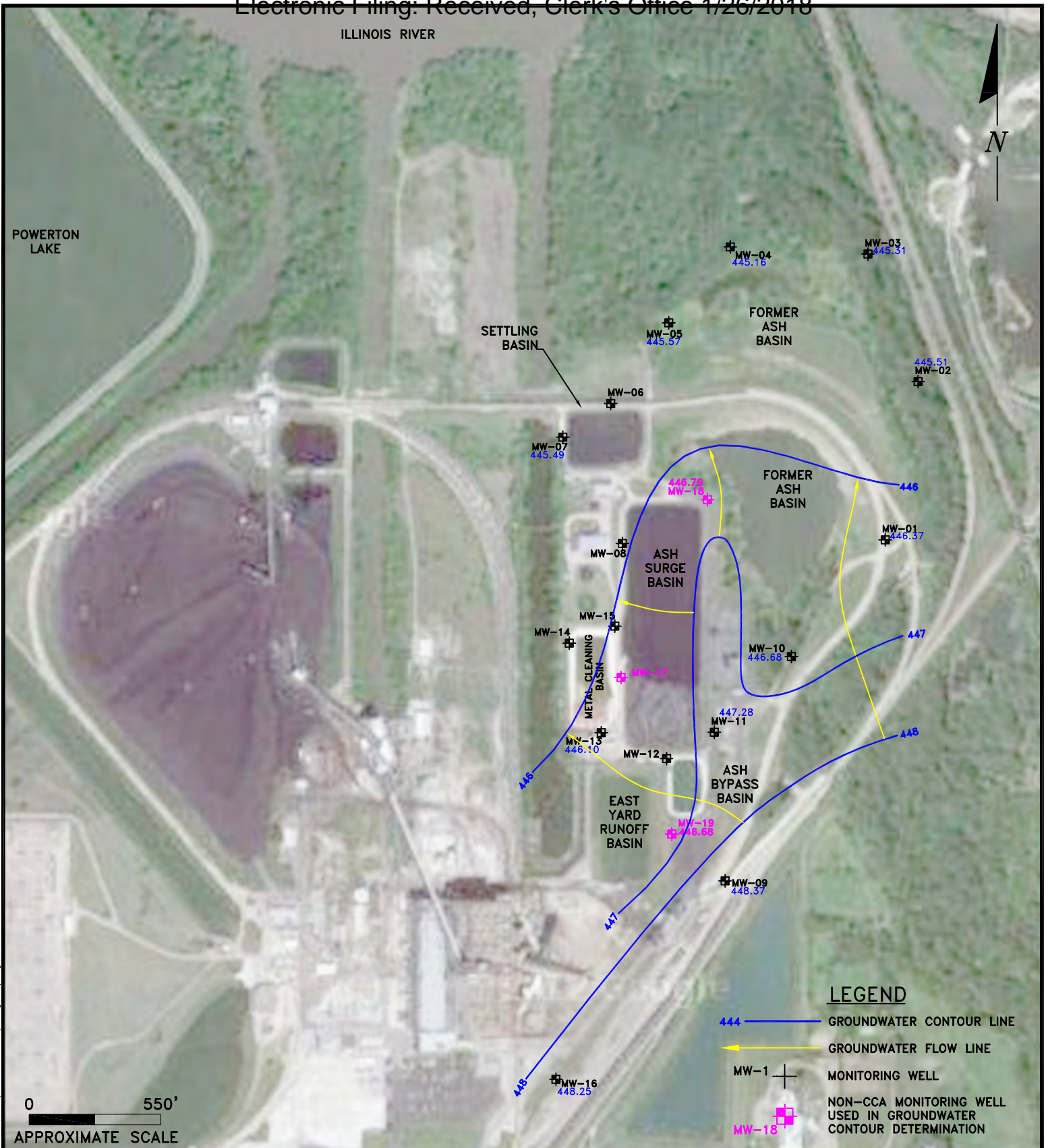
Scale: 1" = 250' Date: June 22, 2017

KPRG Project No. 12313.0 FIGURE 2

ILLINOIS RIVER

POWERTON LAKE

N



0 550'

APPROXIMATE SCALE

LEGEND

- 444 ——— GROUNDWATER CONTOUR LINE
- GROUNDWATER FLOW LINE
- MW-1 ——— MONITORING WELL
- NON-CCA MONITORING WELL USED IN GROUNDWATER CONTOUR DETERMINATION

ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, inc.

GROUNDWATER CONTOUR MAP FOR GRAVELLY SAND UNIT 05/2017

**POWERTON STATION
PEKIN, ILLINOIS**

14665 West Lisbon Road, Suite 2B Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

Scale: 1" = 550'

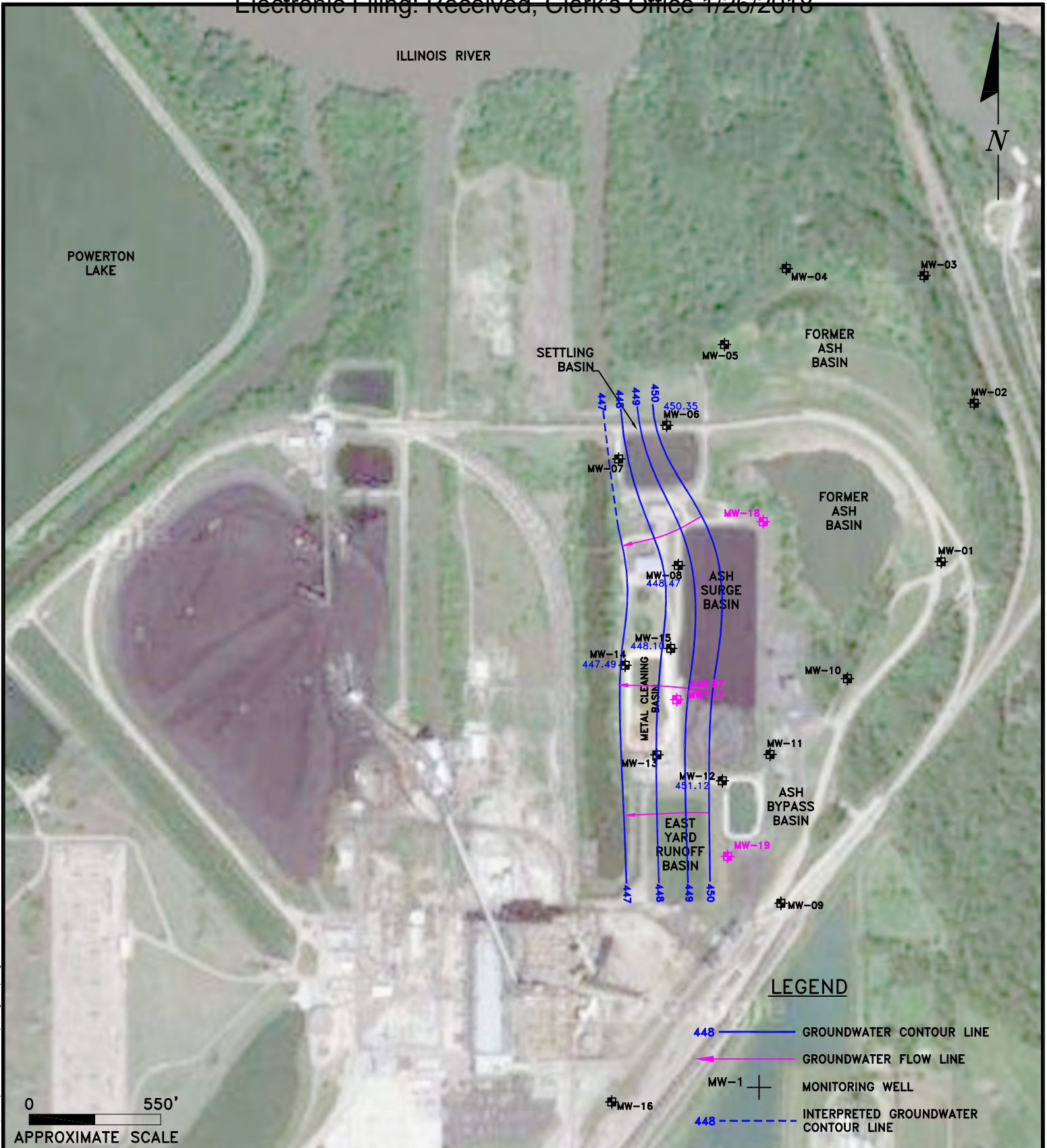
Date: June 16, 2017

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

KPRG Project No. 12313.1

FIGURE 3

T:\projects\midwest\generation\12313\figures\powerton\2017\powerton station 1.g2017.gvw.map.dwg(sand)



ENVIRONMENTAL CONSULTATION & REMEDIATION

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KPRG and Associates, inc.

14665 West Lisbon Road, Suite 2B Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

GROUNDWATER CONTOUR MAP FOR SILT/CLAY UNIT 05/2017

**POWERTON STATION
PEKIN, ILLINOIS**

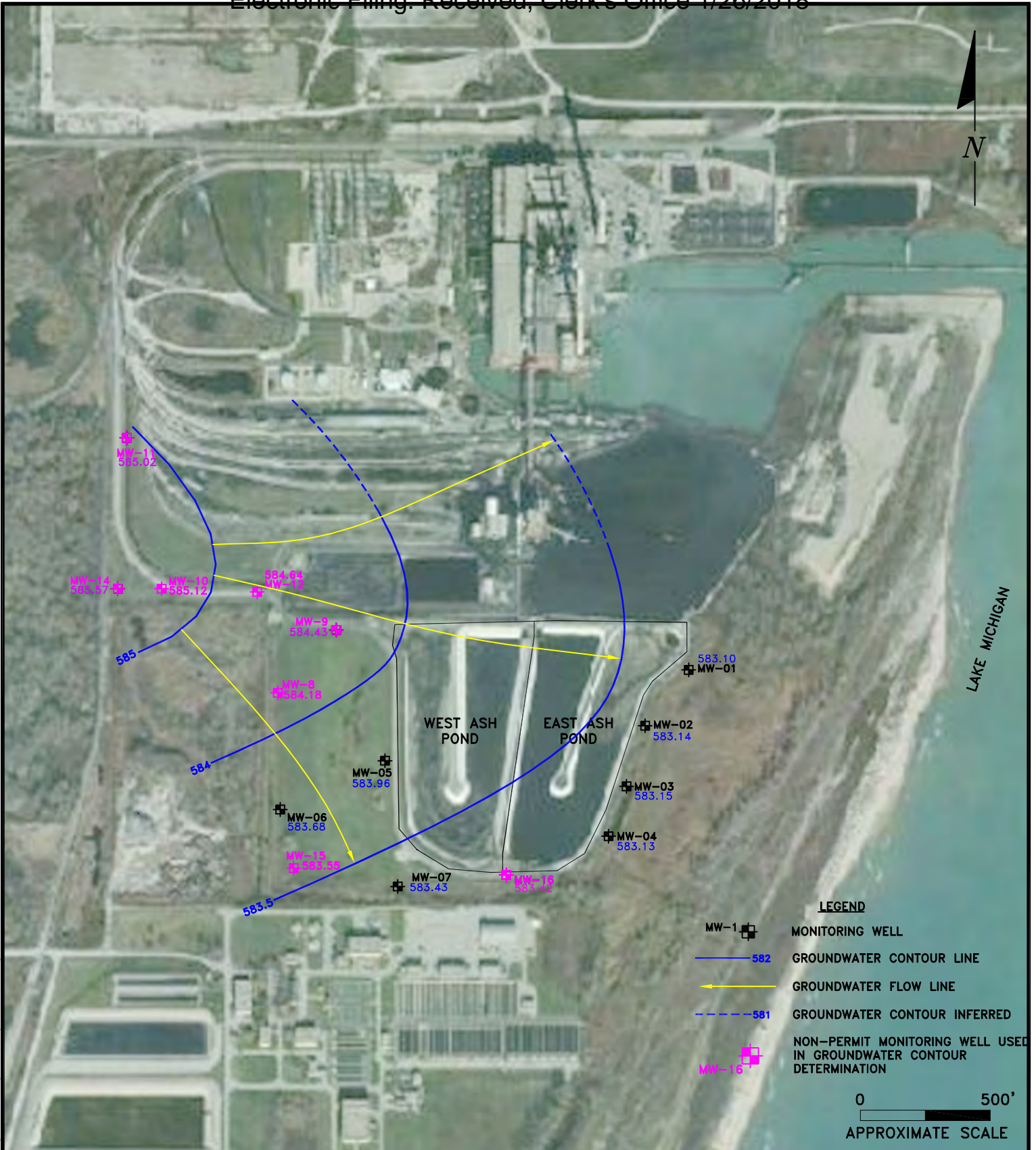
Scale: 1" = 550'

Date: June 16, 2017

KPRG Project No. 12313.1

FIGURE 2

T:\projects\midwest\generation\12313_figures\powerton\2017\powerton station 1.g2017_gw_map.dwg\stb



LEGEND

- MW-1 MONITORING WELL
- 582 GROUNDWATER CONTOUR LINE
- GROUNDWATER FLOW LINE
- 581 GROUNDWATER CONTOUR INFERRED
- NON-PERMIT MONITORING WELL USED IN GROUNDWATER CONTOUR DETERMINATION

0 500'
APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G KPRG and Associates, inc.

14665 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

GROUNDWATER CONTOUR MAP 05/2017

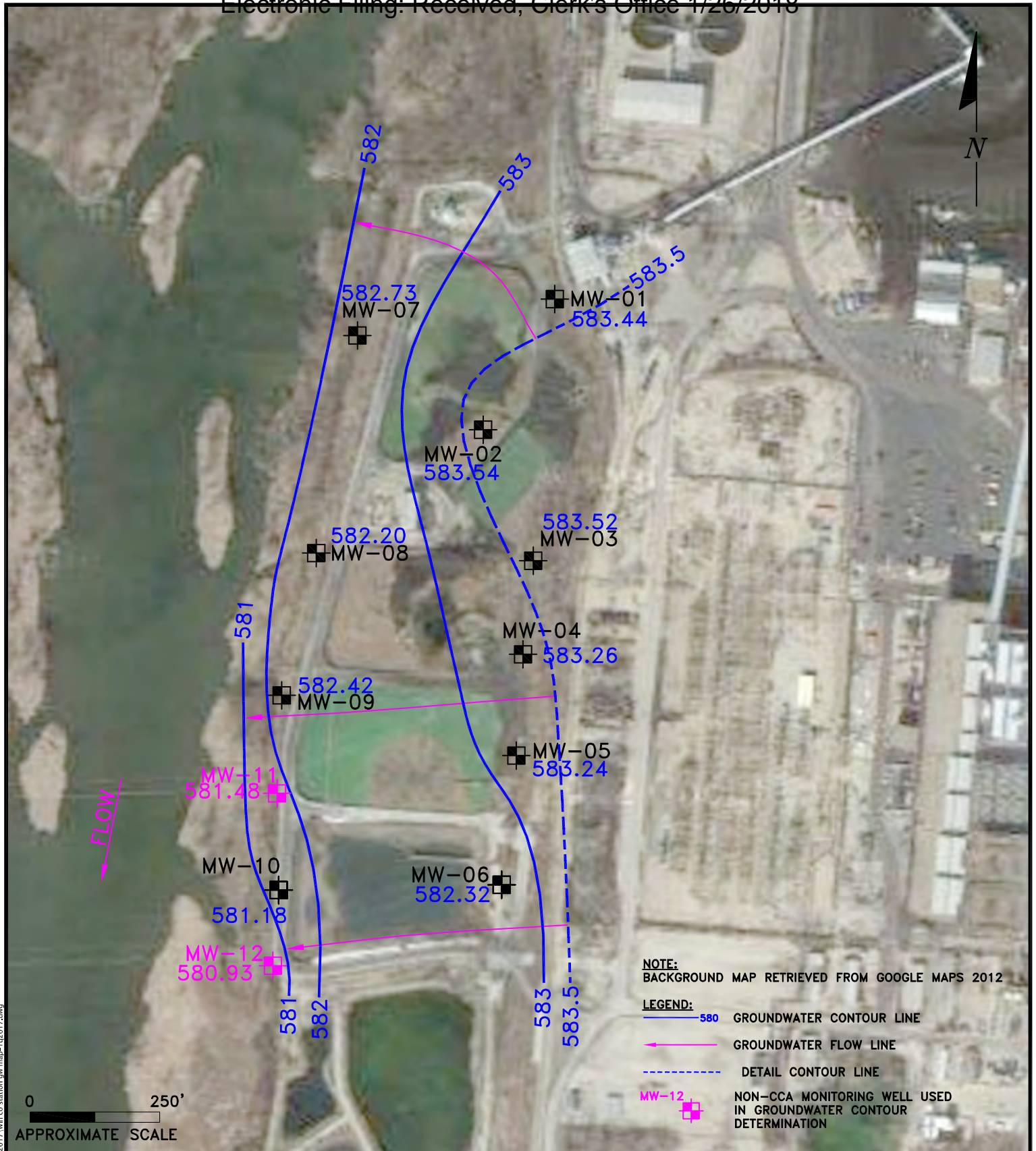
WAUKEGAN STATION
WAUKEGAN, ILLINOIS

Scale: 1" = 500' Date: January 23, 2018

KPRG Project No. 12313.2

FIGURE 2

T:\projects\midwest\generation_12313\figures\waukegan_2017\waukegan_ccr & cca.gw_map-2q2017.dwg



NOTE:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2012

- LEGEND:**
- 580 GROUNDWATER CONTOUR LINE
 - GROUNDWATER FLOW LINE
 - - - - - DETAIL CONTOUR LINE
 - MW-12 NON-CCA MONITORING WELL USED IN GROUNDWATER CONTOUR DETERMINATION

0 250'
APPROXIMATE SCALE

W:\projects\midwest\generation\12313\will_county\2017\will_co_station_gw_map-1q2007.dwg

ENVIRONMENTAL CONSULTATION & REMEDIATION		GROUNDWATER CONTOUR MAP 05/2017	
<div style="font-size: 2em; font-weight: bold; letter-spacing: 0.5em;">K P R G</div> <p>KPRG and Associates, inc.</p>		WILL COUNTY STATION ROMEIOVILLE, ILLINOIS	
14665 West Lisbon Road, Suite 2B Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478		Scale: 1" = 250'	Date: June 22, 2017
414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593		KPRG Project No. 12313.3	FIGURE 2