



**MIDWEST
GENERATION EME, LLC**

An EDISON INTERNATIONAL® Company

Amy L. Hanrahan
Senior Environmental
Engineer
Environmental Services

January 18, 2013

Ms. Andrea Rhodes
Illinois Environmental Protection Agency – DPWS
MC #19
1021 North Grand Avenue East
Springfield, IL 62702

VIA FEDERAL EXPRESS

Re:

Compliance Commitment Agreement -- Groundwater Management Zone
Application
Midwest Generation, LLC, Joliet #29 Generating Station; ID No. 6284
Violation Notice W-2012-00059

Dear Ms. Rhodes:

The Compliance Commitment Agreement (CCA) for the above referenced site relative to Violation Notice W-2012-00059 was signed by Midwest Generation on October 15, 2012 and executed by Illinois Environmental Protection Agency (IEPA) signature on October 24, 2012 (effective date). Item 5 (f) of the CCA requires Midwest Generation to submit an application to establish a Groundwater Management Zone (GMZ) pursuant to 35 Ill. Adm. Code Part 620.250 within 90 days of the effective date of the CCA.

Based on previous discussions with IEPA, the proposed areal extent of the GMZ is shown on Figure 1 in Attachment 1. The GMZ Application Forms (Parts I through III) and supporting information/data are provided in Attachment 2. As discussed in the Application Forms support documentation, groundwater flow in the vicinity of the subject ash ponds is in a southerly direction with discharge to the adjoining station water intake channel off of the Des Plaines River. The southern (downgradient) extent of the proposed GMZ corresponds with this hydraulic boundary. The northern (upgradient) boundary is defined by the placement of the three upgradient monitoring wells (MW-8, MW-10 and MW-11). The east and west sides of the proposed GMZ are based on the flow system and location of the three ash ponds. The vertical extent of the GMZ would be the first underlying aquitard/confining unit identified as the Maquoketa Shale, approximate 180 to 200 feet below ground surface. The GMZ would therefore vertically include the unconsolidated overburden and the Silurian dolomite, both of which are hydraulically connected and overlie the Maquoketa Shale.

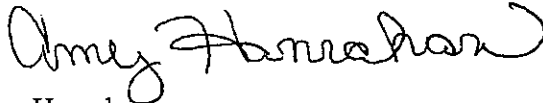
235 Remington Blvd.
Suite A
Bolingbrook, IL 60440
Tel: 630 771 7863
Fax: 949 225 0813
ahanrahan@mwgen.com

MWG13-15_667

Comp. Ex. 242

This submittal fulfills the requirements set forth under Item 5 (f) of the signed CCA. Once the application is approved by IEPA and the proposed extent of the GMZ is agreed upon, a formal surveying of the area will be performed and legal description generated. Please call me at 630-771-7863 if there are any questions.

Sincerely,
Midwest Generation, LLC



Amy Hanrahan
Senior Environmental Engineer

*Attachments: 1 – Proposed Areal Extent of GMZ
2 – Completed GMZ Application Forms (Parts I through III)*

cc: Ms. Maria Race, Midwest Generation EME, LLC
Mr. Basil Constantelos, Midwest Generation EME, LLC
Mr. James DiCola, Midwest Generation, LLC
Mr. Christopher Foley, Midwest Generation EME, LLC
Ms. Susan Franzetti, Nijman Franzetti, LLP
Mr. Richard Gnat, KPRG and Associates, Inc.
Mr. Bill Buscher, IEPA

ATTACHMENT 1
Proposed Areal Extent of GMZ

ATTACHMENT 2
Completed GMZ Application Forms (Parts I through III)

**Section 620.APPENDIX D Confirmation of an Adequate Corrective Action
Pursuant to 35 Ill. Adm. Code 620.250(a)(2)**

Pursuant to 35 Ill. Adm. Code 620.250(a) if an owner or operator provides a written confirmation to the Agency that an adequate corrective action, equivalent to a corrective action process approved by the Agency, is being undertaken in a timely and appropriate manner, then a groundwater management zone may be established as a three-dimensional region containing groundwater being managed to mitigate impairment caused by the release of contaminants from a site. This document provides the form in which the written confirmation is to be submitted to the Agency.

- Note 1. Parts I and II are to be submitted to IEPA at the time that the facility claims the alternative groundwater standards. Part III is to be submitted at the completion of the site investigation. At the completion of the corrective process, a final report is to be filed which includes the confirmation statement included in Part IV.
- Note 2. The issuance of a permit by IEPA's Division of Air Pollution Control or Water Pollution Control for a treatment system does not imply that the Agency has approved the corrective action process.
- Note 3. If the facility is conducting a cleanup of a unit which is subject to the requirements of the Resource Conservation and Recovery Act (RCRA) or the 35 Ill. Adm. Code 731 regulations for Underground Storage Tanks, this confirmation process is not applicable and cannot be used.
- Note 4. If the answers to any of these questions require explanation or clarification, provide such in an attachment to this document.

Part I. Facility Information

Facility Name Joliet #29 Generating Station

Facility Address 1800 Channahon Road
Joliet, IL 60436

County Will County

Standard Industrial Code (SIC) 4911

1. Provide a general description of the type of industry, products manufactured, raw materials used, location and size of the facility.

The Midwest Generation Joliet #29 Station is a coal-fired electrical power generating station in operation since the mid-1960s. The facility is located at 1800 Channahon Road in Joliet, Illinois. The generating station property covers an area of approximately 297 acres.

2. What specific units (operating or closed) are present at the facility which are or were used to manage waste, hazardous waste, hazardous substances or petroleum?

	<u>YES</u>	<u>NO</u>
Landfill		<u>X</u>
Surface Impoundment	<u>X</u>	
Land Treatment		<u>X</u>
Spray Irrigation		<u>X</u>
Waste Pile		<u>X</u>
Incinerator		<u>X</u>
Storage Tank (above ground)	<u>X</u>	
Storage Tank (underground)	<u>X</u>	
Container Storage Area	<u>X</u>	
Injection Well		<u>X</u>
Water Treatment Units	<u>X</u>	
Septic Tanks		<u>X</u>
French Drains		<u>X</u>
Transfer Station		<u>X</u>
Other Units (please describe)		
_____	_____	_____
_____	_____	_____

3. Provide an extract from a USGS topographic or county map showing the location of the site and a more detailed scaled map of the facility with each waste management unit identified in Question 2 or known/suspected source clearly identified. Map scale must be specified and the location of the facility must be provided with respect to Township, Range and Section.

Please see Figures 1 and 2 in Attachment 2A.

4. Has the facility ever conducted operations which involved the generation, manufacture, processing, transportation, treatment, storage or handling of "hazardous substances" as defined by the Illinois Environmental Protection Act? Yes X No If the answer to this question is "yes" generally describe these operations.

Hazardous substances such as mercury debris and debris contaminated with lead are properly labeled and stored at this facility until they are removed for proper transport and disposal.

5. Has the facility generated, stored or treated hazardous waste as defined by the Resource Conservation and Recovery Act? Yes X No ___ If the answer to this question is "yes" generally describe these operations.

Hazardous substances such as mercury debris and debris contaminated with lead are properly labeled and stored at this facility until they are removed for proper transport and disposal.

6. Has the facility conducted operations which involved the processing, storage or handling of petroleum? Yes X No ___ If the answer to this question is "yes" generally describe these operations.

The facility stores oil for operations in above ground storage tanks and drums. Gasoline is stored in an underground storage tank.

7. Has the facility ever held any of the following permits?

- a. Permits for any waste storage, waste treatment or waste disposal operation. Yes X No ___ If the answer to this question is "yes", identify the IEPA permit numbers.

The facility utilizes a sewerage treatment system that discharges to the Des Plaines River under NPDES Permit No. IL0064254. The facility also disposes of bottom ash via sluice lines to the Lincoln Stone Quarry which is an IEPA permitted ash landfill (Permit No. 1994-241-LFM, Modification No. 17).

- b. Interim Status under the Resources Conservation and Recovery Act (filing of a RCRA Part A application). Yes ___ No X If the answer to this question is "yes", attach a copy of the last approved Part A application.

- c. RCRA Part B Permits. Yes ___ No X If the answer to this question is "yes", identify the permit log number.

8. Has the facility ever conducted the closure of a RCRA hazardous waste management unit? Yes ___ No X

9. Have any of the following State or federal government actions taken place for a release at the facility?

- a. Written notification regarding known, suspected or alleged contamination on or emanating from the property (e.g., a Notice pursuant to Section 4(q) of the Environment Protection Act)? Yes X No ___ If the to this question is "yes", identify the caption and date of issuance.

A Violation Notice was issued by IEPA on June 11, 2012 relative to the three ash impoundments alleging a potential release of coal ash constituents to groundwater (Violation Notice No. W-2012-00059). This was resolved through a Compliance Commitment Agreement (CCA) dated September 28, 2012 and formally executed on October 24, 2012.

There was also a spill of turbine oil at the facility on December 7, 2012 which entered a surface water way. The spill was addressed properly on conjunction with State and Federal oversight. To date no formal violation notice has been issued.

- b. Consent Decree or Order under RCRA, CERCLA, EPAct Section 22.2 (State Superfund), or EPAct Section 21(f) (State RCRA). Yes ___ No X
- c. If either of Items a or b were answered by checking "yes", is the notice, order or decree still in effect? Yes X No ___

10. What groundwater classification will the facility be subject to at the completion of the remediation?

Class I X Class II ___ Class III ___ Class IV ___
If more than one Class applies, please explain.

11. Describe the circumstances which the release to groundwater was identified.

As requested by Illinois Environmental Protection Agency (IEPA), a groundwater monitoring plan was developed and implemented for Ash Ponds 1 through 3 located on the east side of the facility. A total of eleven monitoring wells were installed around the three ash ponds. Quarterly sampling was initiated in December 2010 and has been ongoing since. The data were provided to IEPA on a quarterly basis. Based on the monitoring data, on June 11, 2012, IEPA issued a Violation Notice (W-2012-00059) to Midwest Generation alleging that potential leakage from the ponds has resulted in a violation of Class I groundwater standards for antimony, boron, chloride, iron, manganese, sulfate and total dissolved solids.

Based on my inquiry of those persons directly responsible for gathering the information, I

certify that the information submitted is, to the best of my knowledge and belief, true and accurate.

Joliet #29 Generating Station	
_____ Facility Name	_____ Signature of Owner/Operator
Joliet, IL	Midwest Generation, LLC
_____ Location of Facility	_____ Name of Owner/Operator
ID No. 6284	January 17, 2013
_____ EPA Identification Number	_____ Date

PART II: Release Information

1. Identify the chemical constituents release to the groundwater. Attach additional documents as necessary.

<u>Chemical Description</u>	<u>Chemical Abstract No.</u>
Antimony	7440-36-0
Boron	7440-42-8
Chloride	16887-00-6
Iron	7439-89-6
Manganese	7439-96-5
Sulfate	18785-72-3
Total Dissolved Solids	C-010

2. Describe how the site will be investigated to determine the source or sources of the release.

This work has already been performed. As requested by Illinois Environmental Protection Agency (IEPA), Midwest Generation, LLC (Midwest Generation) prepared and submitted on September 3, 2010 a Hydrogeologic Assessment Plan for three ash ponds located at the Joliet No. 29 Generating Station. The purpose of the hydrogeologic assessment was to: (i) evaluate the potential, if any, for migration of ash related constituents from the ash ponds and conduct monitoring for groundwater constituents regulated by Illinois Part 620 groundwater standards; (ii) characterize the subsurface hydrogeology; and (iii) identify potable well use within 2,500 feet of the ash ponds.

Upon IEPA approval of the Hydrogeologic Assessment Plan, a total of eleven monitoring wells (MW-1 through MW-11) were installed around the three ash ponds identified as Ash Pond 1 through Ash Pond 3 (see Figure 3 in Attachment 2A). The wells were drilled and constructed in October/November 2010 after which point quarterly monitoring was initiated in accordance with approved, low-flow and/or disposable polyethylene bailer sampling procedures. A Hydrogeologic Assessment Report for Joliet Generating Station No. 29 was prepared by Patrick Engineering, Inc. and submitted by Midwest Generation, LLC to IEPA in February 2011. The results of the Hydrogeologic Assessment Report are incorporated into this application submittal by reference.

Since the submittal of the Hydrogeologic Assessment Report in February 2011, quarterly monitoring of the wells has been ongoing. The most recent round of sampling was performed in December 2012. A complete updated data summary is provided in Tables 1 and 2 in Attachment 2B. An updated groundwater flow map using the water level measurements from the most recent round of sampling is provided as Figure 4 in Attachment 2A.

3. Describe how groundwater will be monitored to determine the rate and extent of the release.

As part of the hydrogeologic assessment already performed (see discussion for item 2 above), in-situ hydraulic conductivity tests were performed on four of the monitoring wells (MW-4, MW-6, MW-9 and MW-11) installed around the ash ponds. Based on the results of the testing, hydraulic conductivity values in the vicinity of the well screens were found to range from 1.948×10^{-3} to 6.949×10^{-3} ft/sec with an average hydraulic conductivity of 3.896×10^{-3} ft/sec. Using the average hydraulic conductivity value, an estimated hydraulic gradient of 0.0005 ft/ft based on the most recent groundwater contour map (Figure 4 in Attachment 2A) and an estimated effective porosity of 0.35 yields an estimated groundwater seepage velocity of approximately 0.48 ft/day.

Relative to the extent of impacts, a box-plot map of detections of the constituents identified in Part II - Item 1 above is provided as Figure 5 in Attachment 2A.

4. Has the release been contained on-site at the facility?

Yes. All groundwater monitoring data indicates that the impacts are limited to within the property boundary. Natural groundwater flow is in a southerly direction with discharge to the adjoining plant surface water intake channel off of the Des Plaines River.

5. Describe the groundwater monitoring network and groundwater and soil sampling protocols in place at the facility.

The IEPA approved groundwater monitoring network at the site consists of eleven monitoring wells (MW-1 through MW-11) located around the three existing ash ponds (see Figure 1 in Attachment 2A). Wells MW-8, MW-10 and MW-11 are upgradient monitoring wells. The remaining wells are considered downgradient monitoring points. The well borings were advanced using hollow-stem augers to depths ranging from 27.5 to 42 feet below ground surface (bgs). The depth of a specific boring was terminated approximately 10 feet below the encountered water table. The wells were subsequently constructed using standard, 2-inch diameter PVC casing with 10-feet of 0.010 slot PVC screens. The wells were completed approximately three feet above grade with locking protective steel casings and bumper posts. The boring logs and well construction summaries are included in the above referenced Hydrogeologic Assessment Report (see discussion for item 2 above). The monitoring wells are sampled on a quarterly basis using either low-flow sampling with a peristaltic pump or with disposable polyethylene bailers. Field measurements of pH, specific conductivity, temperature, dissolved oxygen (DO) and oxidation-reduction potential (ORP) are recorded. Once collected, the samples are placed on ice and transported under a completed chain-of-custody to

TestAmerica, Inc. which is an Illinois accredited analytical laboratory. The samples are analyzed for the inorganic compounds listed in 35 IAC 620.410(a) and (d), excluding radium 226/228.

There is no soil sampling that is performed as part of the approved site monitoring program.

6. Provide the schedule for investigation and monitoring.

Groundwater sampling of all existing monitoring wells is performed on a quarterly basis. The general sampling schedule is as follows:

<u>Event</u>	<u>Sampling Schedule</u>
1 st Quarter	March
2 nd Quarter	June
3 rd Quarter	September
4 th Quarter	December

7. Describe the laboratory quality assurance program utilized for the investigation.

TestAmerica's Quality Assurance Manual (QAM) is a document prepared to define the overall policies, organization objectives and functional responsibilities for achieving the laboratory's data quality goals. The laboratory maintains a local perspective in its scope of services and client relations and maintains a national perspective in terms of quality.

The QAM has been prepared to assure compliance with the NELAC Institute (TNI) Standard, dated 2009, Volume 1 Modules 2 and 4, and ISO/IEC Guide 17025:2005(E). In addition, the policies and procedures outlined in this manual are compliant with TestAmerica's Corporate Quality Management Plan (CQMP) and the various accreditation and certification programs. The CQMP provides a summary of TestAmerica's quality and data integrity system. It contains requirements and general guidelines under which all TestAmerica facilities shall conduct their operations.

The QAM has been prepared to be consistent with the requirements of the following documents:

- EPA 600/4-88/039, *Methods for the Determination of Organic Compounds in Drinking Water*, EPA, Revised July 1991.
- EPA 600/R-95/131, *Methods for the Determination of Organic Compounds in Drinking Water*, Supplement III, EPA, August 1995.
- EPA 600/4-79-019, *Handbook for Analytical Quality Control in Water and Wastewater Laboratories*, EPA, March 1979.

- Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846), Third Edition, September 1986, Final Update I, July 1992, Final Update IIA, August 1993, Final Update II, September 1994; Final Update IIB, January 1995; Final Update III, December 1996; Final Update IV, January 2008.
- Federal Register, 40 CFR Parts 136, 141, 172, 173, 178, 179 and 261.
- Statement of Work for Inorganics Analysis, SOM and ISM, current versions, USEPA Contract Laboratory Program Multi-media, Multi-concentration.
- APHA, *Standard Methods for the Examination of Water and Wastewater*, 18th Edition, 19th, 20th, 21st and on-line Editions.
- U.S. Department of Energy Order 414.1C, Quality Assurance, June 17, 2005.
- U.S. Department of Energy, *Quality Systems for Analytical Services*, Revision 3.6, November 2010.
- U.S. Department of Defense, *Quality Systems Manual for Environmental Laboratories*, Final Version 4.2, October 2010.
- U.S. Department of Defense, *Air Force Center for Environmental Excellence Quality Assurance Project Plan (QAPP)*, Version 4.0.02, May 2006.
- National Environmental Laboratory Accreditation Conference, Constitution, Bylaws, and Standards, EPA 600/R-04/003, US EPA Office of Research and Development, June 2003
- Toxic Substances Control Act (TSCA).

Copies of TestAmerica's QAM and CQMP can be provided upon request.

8. Provide a summary of the results of available soil testing and groundwater monitoring associated with the release at the facility. The summary or results should provide the following information: dates of sampling; types of samples taken (soil or water); locations and depths of samples; sampling and analytical methods; analytical laboratories used; chemical constituents for which analyses were performed; analytical detection limits; and concentrations of chemical constituents in ppm (levels below detection should be identified as "ND").

The data summary for all groundwater sampling performed to date is provided in Tables 1 and 2 in Attachment 2B.

Based on my inquiry of those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of knowledge and belief, true and accurate and confirm that the actions identified herein will be undertaken in accordance

with the schedule set forth herein.

Joliet #29 Generating Station

Facility Name

Joliet, IL

Location of Facility

ID No. 6284

EPA Identification Number


Signature of Owner/Operator

Midwest Generation, LLC

Name of Owner/Operator

January 17, 2013

Date

Part III: Remedy Selection Information

1. Describe the selected remedy.

Ash Ponds 1 and 2 were already lined with high density polyethylene (HDPE) and Ash Pond 3 currently has a Poz-o-Pac liner. The agreed upon remedy is specified in Item 5 (a) through (h) of the executed Compliance Commitment Agreement (CCA) which is provided in Attachment 2C. The remedy includes lining of Ash Pond 3 with HDPE. This Groundwater Management Zone (GMZ) application fulfills requirements set forth under Item 5 (f) of the CCA.

2. Describe other remedies which were considered and why they were rejected.

The primary alternate remedy discussed during negotiations with IEPA was to ensure that the ash ponds will not be used as permanent disposal sites, maintain the ash ponds in a manner that will be protective of the integrity of the existing liners, include visual inspections of the liners during ash removal events, implement repairs or replacement of the liners as necessary, establish a GMZ and to continue with the existing quarterly groundwater monitoring program until the federal ash regulation revisions are established. Upon the finalization of the new federal ash storage regulations, retrofit the impoundments, as necessary, to meet the new technical requirements for ash storage impoundments or re-engineer plant processes to maintain compliance and take the impoundments out of service.

This remedy was rejected by IEPA due to the uncertainty of the timeframe within which the new federal regulations will be issued.

3. Will waste, contaminated soil or contaminated groundwater be removed from the site in the course of this remediation? Yes X No If the answer to this question is "yes", where will the contaminated material be taken?

The ash that will be removed from Ash Pond 3 to facilitate new liner construction will be taken to the Lincoln Stone Quarry which is an IEPA permitted ash landfill (Permit No. 1994-241-LFM, Modification No. 17).

4. Describe how the selected remedy will accomplish the maximum practical restoration of beneficial use of groundwater.

Once Ash Pond 3 is relined with a HDPE liner, all three ponds will have been constructed and operated to minimize potential release of ash pond fluids to groundwater. Any residual groundwater impacts potentially associated with prior ash pond leakage will naturally attenuate through the groundwater system under monitored conditions within the established GMZ with discharge to the water intake

channel immediately south of the units.

5. Describe how the selected remedy will minimize any threat to public health or the environment.

The existing conditions do not pose a threat to public health since the impacts are limited to within the property boundary, there are no groundwater use receptors and the ponds are located within a fenced property with 24-hour security controlled access. Any potential impacts to the environment will be minimized and managed as discussed under item 4 above.

6. Describe how the selected remedy will result in compliance with the applicable groundwater standards.

Once Ash Pond 3 is relined with an HDPE liner, all three ponds will have been constructed and operated to minimize potential release of ash pond fluids to groundwater (i.e, the ash ponds as a potential source of groundwater impacts will be eliminated). Any residual groundwater impacts potentially associated with prior ash pond leakage will naturally attenuate through the groundwater system under monitored conditions within the established GMZ and/or discharge to the river water intake channel located immediately north of the ash ponds.

7. Provide a schedule for design, construction and operation of the remedy, including dates for the start and completion.

The construction window for relining Ash Pond 3 is from May 6, 2013 through September 26, 2013. Dredging of the ash will occur between May 6, 2013 and July 25, 2013. At this time liner installation is anticipated to occur in August 2013.

A more detailed schedule is being provided under separate cover with the Application for Construction Permit to reline the two ponds.

8. Describe how the remedy will be operated and maintained.

Upon completion of construction activities, Midwest Generation will develop and submit an Operation and Maintenance (O&M) Plan to the IEPA. The O&M Plan will be based on manufacturer and installer recommendations. It will include procedures for liner system inspections, inspection frequency, documentation requirements and what corrective measure procedures are to be implemented, if necessary.

9. Have any of the following permits been issued for the remediation?

- a. Construction or Operating permit from the Division of Water Pollution Control. Yes X No

This permit submittal is currently under review by IEPA.

- b. Land treatment permit from the Division of Water Pollution Control. Yes ___ No X If the answer to this question is "yes", identify the permit number.
- c. Construction or Operating permit from the Division of Air Pollution Control. Yes ___ No X If the answer to this question is "yes", identify the permit number.

10. How will groundwater at the facility be monitored following completion of the remedy to ensure that the groundwater standards have been attained?

There are currently 11 monitoring wells surrounding Ash Ponds 1 through 3 (see Figure 3 in Attachment 2A). As required under Item 5 (d) of the CCA, these wells will continue to be monitored on a quarterly basis for constituents listed in 35 IAC 620.410(a), with the exception of radium 226/228. The monitoring data will be reported to IEPA within 30 days of the end of each quarter. In addition, an updated groundwater potentiometric surface map will be provided with each quarterly submittal. IEPA, upon written request, may approve a reduction in the frequency and scope of the sampling program in the future. Upon the IEPA's approval, the approved changes in the frequency and scope of the monitoring program shall be implemented.

Based on my inquiry of those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true and accurate and confirm that the actions identified herein will be undertaken in accordance with the schedule set forth herein.

Joliet #29 Generating Station

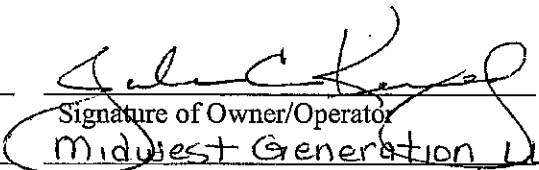
Facility Name

Joliet, IL

Location of Facility

ID No. 6284

EPA Identification Number

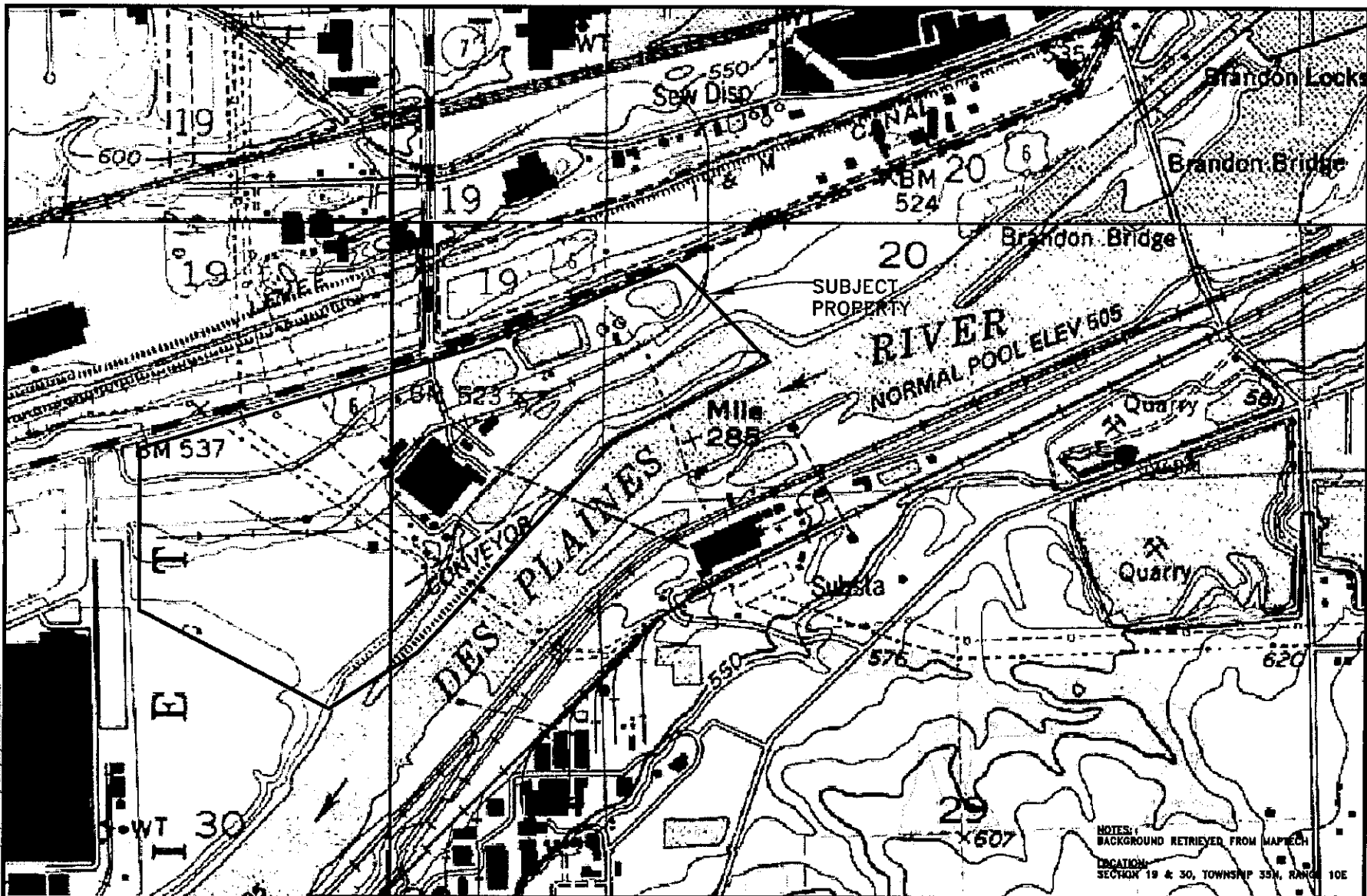

Signature of Owner/Operator

Midwest Generation, LLC
Name of Owner/Operator

January 17, 2013
Date

(Source: Amended at 36 Ill. Reg. 15206, effective October 5, 2012)

ATTACHMENT 2A
Figures



988_G:\CS\EMM\Environ\site\band\issu\title & pnc\title.p29 pnc.dwg\top site map 8.5x11



ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, Inc.

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

14655 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

USGS TOPOGRAPHIC SITE MAP

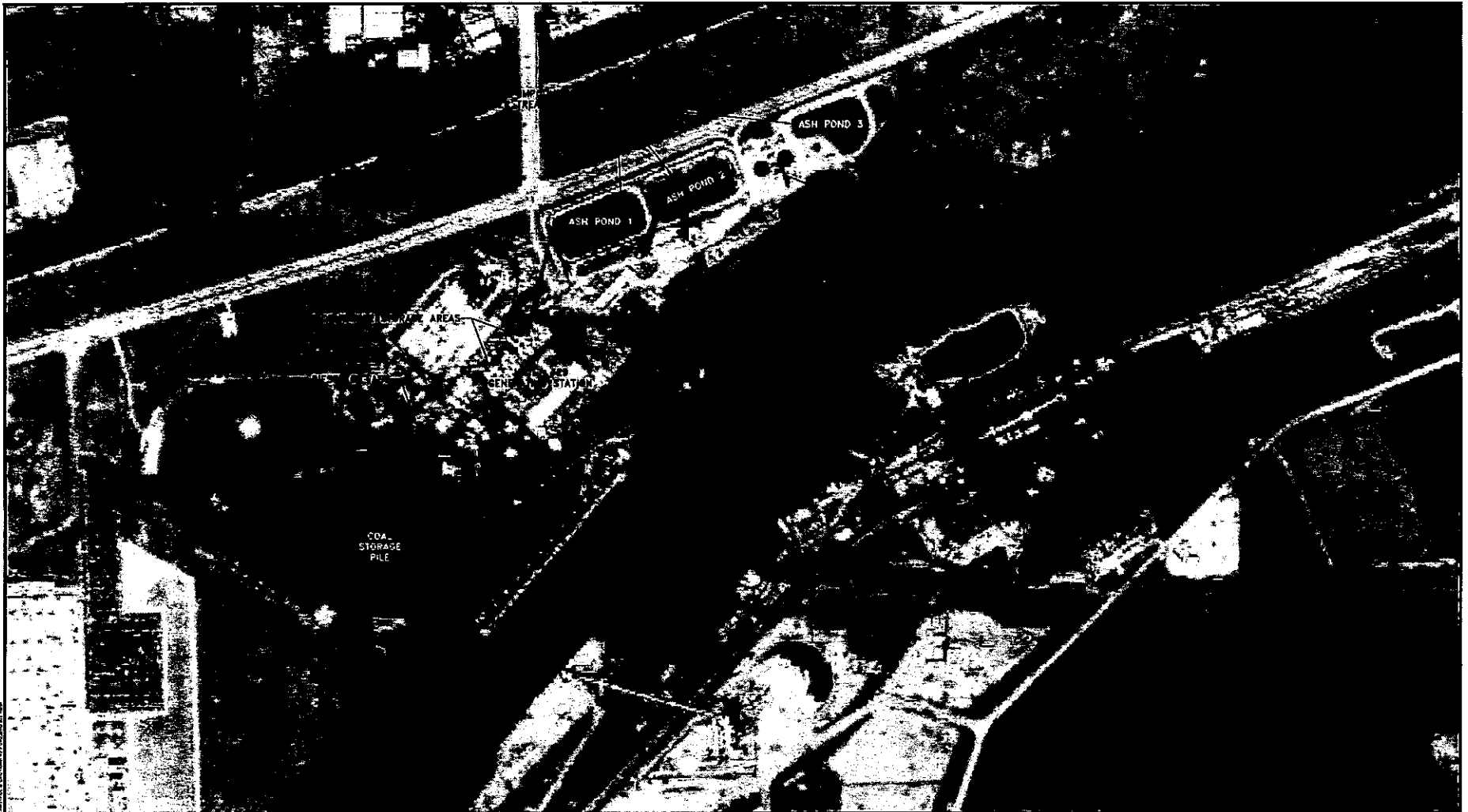
JOLIET #29 GENERATING STATION
JOLIET, ILLINOIS

Scale: 1" = 1,000'

Date: January 4, 2013

KPRG Project No. 18311.11

FIGURE 1



NOTE:
BACKGROUND RETRIEVED FROM GOOGLE MAPS 2012

LOCATION:
SECTION 19 & 30, TOWNSHIP 35 N, RANGE 10 E

0 500'
APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, Inc.

414 Plaza Drive, Suite 105 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-315-1193

34695 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-761-0773 Facsimile 262-761-0476

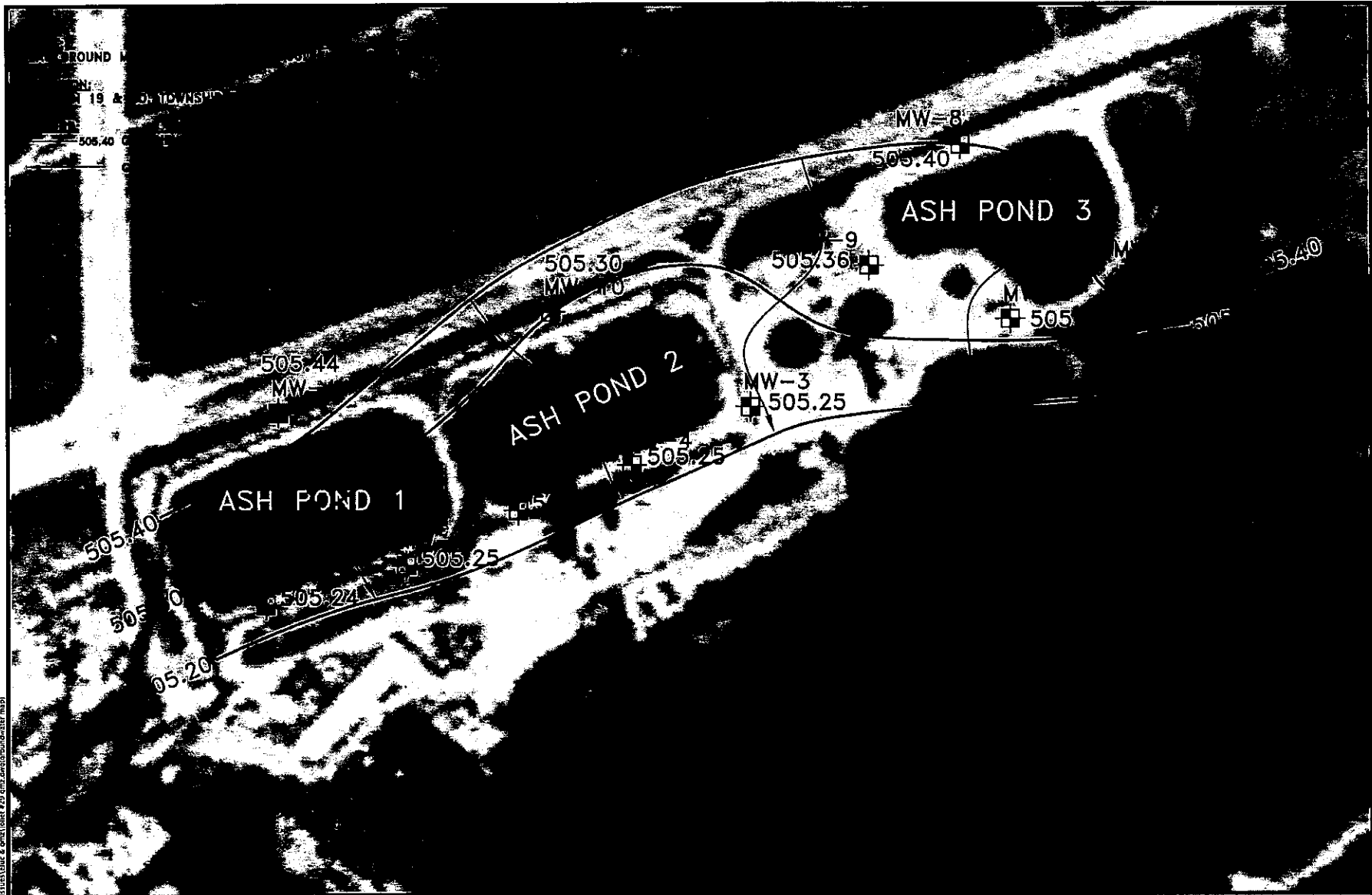
JOLIET #29 STATION SITE MAP

JOLIET #29 GENERATING STATION
JOLIET, ILLINOIS

Scale: 1" = 500' Date: January 7, 2013

KPRG Project No. 18311.11 | FIGURE 2

MM513-15_687



630-312-1311 Environmental/ash_pond/taucatalac & env/taucatalac 429 env/taucatalac/taucatalac map



ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G KPRG and Associates, Inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593
 14665 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

GROUNDWATER CONTOUR MAP 12/20/12

JOLIET #29 GENERATING STATION
 JOLIET, ILLINOIS

Scale: 1" = 250' | Date: January 11, 2013

KPRG Project No. 18311.11 | FIGURE 4

ATTACHMENT 2B
Summary Data Table

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-01		Date		12/6/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	0.0043	NS	NS	0.0030	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.0030	ND	NS	NS		
Arsenic	6020	0.0010	0.0011	NS	NS	0.0010	0.0014	NS	NS	NS	NS	NS	NS	NS	NS	0.0010	0.0012	NS	NS		
Barium	6020	0.0025	0.13	NS	NS	0.0025	0.14	NS	NS	NS	NS	NS	NS	NS	NS	0.0025	0.16	NS	NS		
Beryllium	6020	0.0010	ND	NS	NS	0.0010	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.0010	ND	NS	NS		
Boron	6020	0.050	0.31	NS	NS	0.050	0.29	NS	NS	NS	NS	NS	NS	NS	NS	0.050	0.38 [^]	NS	NS		
Cadmium	6020	0.00050	ND	NS	NS	0.00050	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.00050	ND	NS	NS		
Chloride	9251	10	140	NS	NS	10	170	NS	NS	NS	NS	NS	NS	NS	NS	10	120	NS	NS		
Chromium	6020	0.0050	ND	NS	NS	0.0050	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.0050	ND	NS	NS		
Cobalt	6020	0.0010	ND	NS	NS	0.0010	0.0010	NS	NS	NS	NS	NS	NS	NS	NS	0.0010	ND	NS	NS		
Copper	6020	0.0020	0.0032	NS	NS	0.0020	0.0025	NS	NS	NS	NS	NS	NS	NS	NS	0.0020	0.0021	NS	NS		
Cyanide	9014	0.010	ND	NS	NS	0.010	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.010	ND	NS	NS		
Fluoride	SM 4500 F C	0.10	0.45	NS	NS	0.10	0.43	NS	NS	NS	NS	NS	NS	NS	NS	0.10	0.59	NS	NS		
Iron	6020	0.10	ND	NS	NS	0.10	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.10	ND	NS	NS		
Lead	6020	0.00050	ND	NS	NS	0.00050	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.00050	ND	NS	NS		
Manganese	6020	0.0025	ND	NS	NS	0.0025	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.0025	ND	NS	NS		
Mercury	7470A	0.00020	ND	NS	NS	0.00020	ND [^]	NS	NS	NS	NS	NS	NS	NS	NS	0.00020	ND	NS	NS		
Nickel	6020	0.0020	0.0034	NS	NS	0.0020	0.0029	NS	NS	NS	NS	NS	NS	NS	NS	0.0020	0.0029	NS	NS		
Nitrogen/Nitrate	Nitrogen Calc	0.10	1.9	NS	NS	0.10	2.9	NS	NS	NS	NS	NS	NS	NS	NS	0.10	4.2	NS	NS		
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.20	1.9	NS	NS	0.20	2.9	NS	NS	NS	NS	NS	NS	NS	NS	0.50	4.2	NS	NS		
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	NS	NS	0.020	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.020	ND	NS	NS		
pH	Obtained in field	NA	7.82	NS	NS	NA	7.25	NS	NS	NS	NS	NS	NS	NS	NS	NA	7.46	NS	NS		
Selenium	6020	0.0025	ND	NS	NS	0.0025	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.0025	ND	NS	NS		
Silver	6020	0.00050	ND	NS	NS	0.00050	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.00050	ND	NS	NS		
Sulfate	9038	50	180	NS	NS	25	81	NS	NS	NS	NS	NS	NS	NS	NS	50	240	NS	NS		
Thallium	6020	0.0020	ND	NS	NS	0.0020	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.0020	ND	NS	NS		
Total Dissolved Solids	SM 2540C	10	590	NS	NS	10	670	NS	NS	NS	NS	NS	NS	NS	NS	10	630	NS	NS		
Zinc	6020	0.020	ND	NS	NS	0.020	ND	NS	NS	NS	NS	NS	NS	NS	NS	0.020	ND	NS	NS		

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 8.8 to 18.8 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

NS - Not Sampled
[^] - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-02		Date		12/6/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	0.012	NS	NS	0.0030	0.0042	0.0030	0.0032	0.0030	ND	0.0030	ND	NS	NS	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	NS	NS	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	NS	NS	0.0010	0.0015	0.0010	ND	0.0010	ND
Barium	6020	0.0025	0.082	NS	NS	0.0025	0.081	0.0025	0.10	0.0025	0.12	0.0025	0.12	NS	NS	0.0025	0.12	0.0025	0.13	0.0025	0.13
Beryllium	6020	0.0010	ND	NS	NS	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	NS	NS	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.31	NS	NS	0.050	0.35	0.050	0.44	0.050	0.74	0.050	0.22	NS	NS	0.050	0.35*	0.050	0.42	0.050	0.42
Cadmium	6020	0.00050	ND	NS	NS	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	NS	NS	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	140	NS	NS	10	230	10	140	10	140	2.0	280	NS	NS	10	120	10	150	10	150
Chromium	6020	0.0050	ND	NS	NS	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	NS	NS	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	NS	NS	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	NS	NS	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	0.0032	NS	NS	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	NS	NS	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	NS	NS	0.010	ND	0.010	ND	0.010	ND	0.010	ND	NS	NS	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.62	NS	NS	0.10	0.58	0.10	0.54	0.10	0.51	0.10	0.53	NS	NS	0.10	0.64	0.10	0.59	0.10	0.59
Iron	6020	0.10	ND	NS	NS	0.50	ND	0.10	ND	0.10	ND	0.10	ND	NS	NS	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	NS	NS	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	NS	NS	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	ND	NS	NS	0.013	ND	0.0025	0.0025	0.0025	ND	0.0025	ND*	NS	NS	0.0025	ND	0.0025	ND	0.0025	ND
Mercury	7470A	0.00020	ND	NS	NS	0.00020	ND*	0.00020	ND	0.00020	ND	0.00020	ND	NS	NS	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0033	NS	NS	0.010	ND	0.0020	0.0027	0.0020	0.0023	0.0020	ND	NS	NS	0.0020	0.0024	0.0020	0.0029	0.0020	0.0029
Nitrogen/Nitrate	Nitrogen Calc	0.10	3.1	NS	NS	0.10	1.8	0.10	2.2	0.10	2.9	0.10	6.4	NS	NS	0.10	4.7	0.10	7.5	0.10	7.5
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.20	3.1	NS	NS	0.10	1.8	0.20	2.2	0.10	2.9	0.50	6.4	NS	NS	0.50	4.7	0.50	7.5	0.50	7.5
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	NS	NS	0.020	ND	0.020	ND	0.020	ND	0.020	ND	NS	NS	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.85	NS	NS	NA	7.30	NA	7.37	NA	7.37	NA		NS	NS	NA	7.39	NA	7.39	NA	7.39
Selenium	6020	0.0025	ND	NS	NS	0.013	ND	0.0025	0.0038	0.0025	0.0055	0.0025	0.0048	NS	NS	0.0025	ND	0.0025	ND	0.0025	ND
Silver	6020	0.00050	ND	NS	NS	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	NS	NS	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	190	NS	NS	25	67	25	110	50	150	50	110	NS	NS	50	190	50	140	50	140
Thallium	6020	0.0020	ND	NS	NS	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	NS	NS	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	600	NS	NS	10	720	10	690	10	750	10	800	NS	NS	10	580	10	720	10	720
Zinc	6020	0.020	ND	NS	NS	0.10	ND	0.020	ND	0.020	ND	0.020	ND	NS	NS	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 10.0 to 20.0 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

NS - Not Sampled
* - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-03		Date		12/7/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	0.0040	0.0030	ND	0.0030	ND	0.0030	0.0065	0.0030	0.016	0.0030	0.013	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	0.0011	0.0050	ND	0.0010	0.0012	0.0010	0.0016	0.0010	0.0014	0.0010	0.0011	0.0010	0.0012	0.0010	0.0010	0.0010	0.0012
Barium	6020	0.0025	0.089	0.0025	0.085	0.0025	0.092	0.0025	0.081	0.0025	0.084	0.0025	0.081	0.0025	0.088	0.0025	0.097	0.0025	0.097	0.0025	0.09
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.24	0.050	0.36	0.050	0.46	0.050	0.24	0.050	0.23	0.050	0.26	0.050	0.31	0.050	0.22^	0.050	0.28	0.050	0.28
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	0.00074	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	260	10	240	10	300	50	160	10	260	2.0	250	10	260	10	330	10	330	10	290
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	0.0013	0.0010	0.0013	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND*	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.43	0.10	0.40	0.10	0.41	0.10	0.31	0.10	0.40	0.10	0.39	0.10	0.43	0.10	0.43	0.10	0.43	0.10	0.38
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.10	0.0025	0.048	0.013	ND	0.0025	0.0076	0.0025	0.0080	0.0025	0.0095^	0.0025	0.014	0.0025	0.011	0.0025	0.011	0.0025	0.0076
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND*	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.011	0.0020	0.0065	0.010	ND	0.0020	0.0041	0.0020	0.0060	0.0020	0.0046	0.0020	0.0044	0.0020	0.0059	0.0020	0.0059	0.0020	0.0063
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	1.0	0.10	2.1	0.10	1.1	0.10	0.79	0.10	1.3	0.10	1.3	0.10	0.88	0.10	0.88	0.10	0.77
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	1.0	0.20	2.1	0.10	1.1	0.10	0.79	0.10	1.3	0.10	1.3	0.10	0.88	0.10	0.88	0.10	0.77
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.84	NA	7.26	NA	7.41	NA	7.37	NA	7.48	NA	7.34	NA	7.21	NA	7.40	NA	7.40	NA	7.42
Selenium	6020	0.0025	ND	0.0025	0.0050	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0043	0.0025	ND	0.0025	ND	0.0025	ND
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	0.00091	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	120	50	160	50	120	25	120	50	160	50	190	25	160	50	150	50	150	50	110
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	930	10	1100	10	1000	10	930	10	1100	10	1000	10	1100	10	1000	10	1000	10	1100
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 6.8 to 16.8 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

^ - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-04		Date		12/7/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	0.0067	0.0030	0.0057	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	0.0011	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Barium	6020	0.0025	0.065	0.0025	0.067	0.0025	0.059	0.0025	0.060	0.0025	0.069	0.0025	0.070	0.0025	0.068	0.0025	0.092	0.0025	0.087	0.0025	0.87
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.46	0.050	0.37	0.050	0.38	0.050	0.25	0.050	0.34	0.050	0.29	0.050	0.48	0.050	0.34^	0.050	0.38	0.050	0.38
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	270	10	270	10	250	10	150	10	200	2.0	210	10	270	10	260	10	250	10	250
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	0.0018	0.0010	0.0028	0.0010	0.0026	0.0010	0.0042	0.0010	0.0059	0.0010	0.0049	0.0010	0.0049
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND*	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.49	0.10	0.38	0.10	0.44	0.10	0.37	0.10	0.44	0.10	0.41	0.10	0.46	0.10	0.47	0.10	0.41	0.10	0.41
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	0.22	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.33	0.0025	0.048	0.013	0.018	0.0025	0.066	0.0025	0.029	0.0025	0.038^	0.0025	0.082	0.0025	0.043	0.0025	0.029	0.0025	0.029
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0067	0.0020	0.0037	0.010	ND	0.0020	0.0029	0.0020	0.0038	0.0020	0.0037	0.0020	0.0036	0.0020	0.0043	0.0020	0.0042	0.0020	0.0042
Nitrogen/Nitrate	Nitrogen Calc	0.10	0.81	0.10	1.6	0.10	2.7	0.10	1.6	0.10	1.4	0.10	0.62	0.10	1.4	0.10	1.3	0.10	0.91	0.10	0.91
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	0.81	0.10	1.6	0.20	2.7	0.10	1.6	0.10	1.4	0.10	0.62	0.10	1.4	0.10	1.3	0.10	0.91	0.10	0.91
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.71	NA	7.15	NA	7.48	NA	7.42	NA	7.56	NA	7.40	NA	7.31	NA	7.37	NA	7.38	NA	7.38
Selenium	6020	0.0025	0.0025	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0047	0.0025	0.0033	0.0025	0.0033
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	300	25	140	25	84	25	74	50	170	50	210	25	110	50	180	50	130	50	130
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	1100	10	1000	10	890	10	770	10	970	10	930	10	1100	10	980	10	1000	10	1000
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 9.4 to 19.4 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

^ - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-05		Date		12/7/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	0.0040	0.0030	0.0035	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	0.0011	0.0010	0.0011	0.0010	ND	0.0010	ND	0.0010	0.0011	0.0010	ND	0.0010	ND
Barium	6020	0.0025	0.061	0.0025	0.092	0.0025	0.053	0.0025	0.053	0.0025	0.062	0.0025	0.069	0.0025	0.056	0.0025	0.071	0.0025	0.078	0.0025	0.078
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.42	0.050	0.52	0.050	0.47	0.050	0.57	0.050	0.49	0.050	0.54	0.050	0.44	0.050	0.55^	0.050	0.65	0.050	0.65
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	0.0016	0.00050	ND	0.00050	0.00091	0.00050	0.00076	0.00050	0.00076
Chloride	9251	10	150	10	240	10	220	10	120	10	190	2.0	210	10	220	10	240	10	210	10	210
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	0.0040	0.0010	0.006	0.0010	0.006
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	0.019	0.0020	0.017	0.0020	0.017
Cyanide	9014	0.010	ND	0.010	ND*	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.40	0.10	0.34	0.10	0.39	0.10	0.28	0.10	0.34	0.10	0.32	0.10	0.38	0.10	0.39	0.10	0.35	0.10	0.35
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	0.00062	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.0065	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0040	0.0025	0.081	0.0025	ND	0.0025	ND
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	0.0021	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	0.0025	0.0020	0.0080	0.0020	0.02
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	1.2	0.10	1.3	0.10	1.1	0.10	1.5	0.10	0.33	0.10	1.0	0.10	ND	0.10	0.21	0.10	0.21
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 P	0.10	ND	0.10	1.2	0.10	1.3	0.10	1.1	0.10	1.5	0.10	0.33	0.10	1.0	0.10	ND	0.10	0.21	0.10	0.21
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.82	NA	7.19	NA	7.44	NA	7.25	NA	7.44	NA	7.30	NA	7.18	NA	7.32	NA	7.36	NA	7.36
Selenium	6020	0.0025	ND	0.0025	0.0072	0.013	ND	0.0025	ND	0.0025	0.0050	0.0025	ND	0.0025	0.0057	0.0025	ND	0.0025	0.0034	0.0025	0.0034
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	25	110	50	160	25	100	50	140	50	140	50	190	25	130	50	210	50	210	50	210
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	750	10	990	10	850	10	800	10	900	10	930	10	1000	10	990	10	1000	10	1000
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 8.8 to 18.8 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

^ - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-06		Date		12/7/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	0.0015	0.0050	ND	0.0010	ND	0.0010	0.0018	0.0010	0.0016	0.0010	0.0014	0.0010	0.0015	0.0010	0.0014	0.0010	0.0014
Barium	6020	0.0025	0.075	0.0025	0.12	0.0025	0.082	0.0025	0.094	0.0025	0.11	0.0025	0.13	0.0025	0.11	0.0025	0.14	0.0025	0.14	0.0025	0.12
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.32	0.050	0.44	0.050	0.32	0.050	0.27	0.050	0.30	0.050	0.25	0.050	0.26	0.050	0.25^	0.050	0.31	0.050	0.31
Cadmium	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	130	10	270	10	140	10	140	10	130	2.0	240	10	210	10	190	10	150	10	150
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	0.0019	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.40	0.10	0.36	0.10	0.44	0.10	0.29	0.10	0.44	0.10	0.36	0.10	0.36	0.10	0.36	0.10	0.36	0.10	0.38
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.14	0.0025	0.033	0.013	ND	0.0025	0.036	0.0025	0.024	0.0025	0.015	0.0025	0.0080	0.0025	0.0087	0.0025	0.0076	0.0025	0.0076
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0056	0.0020	0.0025	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	1.3	0.10	0.91	0.10	0.31	0.10	0.36	0.10	ND	0.10	0.65	0.10	0.55	0.10	0.47	0.10	0.47
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND^	0.10	1.3	0.10	0.91	0.10	0.31	0.10	0.36	0.10	ND	0.10	0.65	0.10	0.55	0.10	0.47	0.10	0.47
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	8.04	NA	7.51	NA	7.71	NA	7.53	NA	7.71	NA	7.57	NA	7.42	NA	7.46	NA	7.66	NA	7.66
Selenium	6020	0.0025	0.0029	0.0025	0.0034	0.013	ND	0.0025	ND	0.0025	0.0054	0.0025	0.0051	0.0025	0.0069	0.0025	0.0073	0.0025	0.0059	0.0025	0.0059
Silver	6020	0.00050	ND	0.00050	0.00077	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	140	50	140	25	87	25	100	50	130	50	110	25	91	25	85	25	120	25	120
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	650	10	1000	10	650	10	620	10	710	10	800	10	860	10	760	10	710	10	710
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 8.0 to 18.0 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

^ - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-07		Date		12/7/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	0.0010	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	0.0014	0.0010	0.0010	0.0010	ND	0.0010	0.0013	0.0010	ND	0.0010	ND
Barium	6020	0.0025	0.13	0.0025	0.11	0.0025	0.072	0.0025	0.092	0.0025	0.11	0.0025	0.13	0.0025	0.092	0.0025	0.12	0.0025	0.11	0.0025	0.11
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.51	0.050	0.39	0.050	0.25	0.050	0.29	0.050	0.35	0.050	0.30	0.050	0.25	0.050	0.31*	0.050	0.41	0.050	0.41
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	50	430	10	320	10	140	10	99	10	140	2.0	300	10	170	10	170	10	140	10	140
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	0.011	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	0.0025	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.36	0.10	0.31	0.10	0.35	0.10	0.27	0.10	0.35	0.10	0.31	0.10	0.37	0.10	0.32	0.10	0.31	0.10	0.31
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	3.8	0.10	ND	0.10	ND	0.10	0.13	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.29	0.0025	0.014	0.013	ND	0.0025	0.080	0.0025	0.0073	0.0025	0.015	0.0025	0.069	0.0025	0.0041	0.0025	0.0063	0.0025	0.0063
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0045	0.0020	ND	0.010	ND	0.0020	0.014	0.0020	ND	0.0020	ND	0.0020	0.0032	0.0020	ND	0.0020	0.0024	0.0020	0.0024
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	1.2	0.10	0.76	0.10	0.27	0.10	0.60	0.10	ND	0.10	0.65	0.10	0.61	0.10	0.73	0.10	0.73
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND*	0.10	1.2	0.10	0.76	0.10	0.27	0.10	0.60	0.10	ND	0.10	0.65	0.10	0.61	0.10	0.73	0.10	0.73
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	8.08	NA	7.50	NA	7.61	NA	7.65	NA	7.63	NA	7.53	NA	7.59	NA	7.45	NA	7.52	NA	7.52
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0031
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	250	50	120	25	85	25	110	50	160	50	140	50	190	50	130	25	90	50	90
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	1200	10	970	10	580	10	650	10	780	10	870	10	760	10	760	10	760	10	760
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 7.5 to 17.5 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

* - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-08		Date		12/6/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Barium	6020	0.0025	0.054	0.0025	0.055	0.0025	0.026	0.0025	0.048	0.0025	0.057	0.0025	0.049	0.0025	0.029	0.0025	0.059	0.0025	0.58		
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.29	0.050	0.16	0.050	0.12	0.050	0.20	0.050	0.16	0.050	0.13	0.050	0.20	0.050	0.46 [^]	0.050	0.33		
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	130	10	350	10	150	10	79	10	120	50	410	10	190	10	130	10	130		
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.51	0.10	0.36	0.10	0.45	0.10	0.25	0.10	0.31	0.10	0.38	0.10	0.41	0.10	0.40	0.10	0.33		
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	0.24	0.10	ND		
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.0051	0.0025	0.0026	0.013	0.017	0.0025	ND	0.0025	ND	0.0025	0.0042	0.0025	0.016	0.0025	0.023	0.0025	0.0044		
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0025	0.0020	ND	0.010	ND	0.0020	0.012	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	0.0021	0.0020	ND		
Nitrogen/Nitrate	Nitrogen Calc	0.10	0.33	0.10	2.2	0.10	1.9	0.10	0.95	0.10	0.86	0.10	ND	0.10	0.44	0.10	4.0	0.10	2.0		
Nitrogen/Nitrate, Nitric	SM 4500 NO3 F	0.10	0.33	0.20	2.2	0.10	1.9	0.10	0.95	0.10	0.86	0.10	ND	0.10	0.44	0.50	4.0	0.10	2.0		
Nitrogen/Nitric	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND		
pH	Obtained in field	NA	7.75	NA	7.29	NA	7.70	NA	7.32	NA	7.38	NA	7.49	NA	7.64	NA	6.80	NA	7.40		
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0079	0.0025	ND		
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	210	25	87	10	52	50	120	50	170	25	130	20	110	50	180	50	130		
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND		
Total Dissolved Solids	SM 2540C	10	670	10	990	10	580	10	690	10	800	10	1000	10	740	10	710	10	730		
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 7.1 to 17.1 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

[^] - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-09		Date		12/6/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	0.0010	0.0010	ND	0.0010	ND	0.0010	ND
Barium	6020	0.0025	0.031	0.0025	0.029	0.0025	0.032	0.0025	0.029	0.0025	0.030	0.0025	0.021	0.0025	0.021	0.0025	0.022	0.0025	0.022	0.0025	0.021
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.36	0.050	0.32	0.050	0.29	0.050	0.35	0.050	0.31	0.050	0.38	0.050	0.34	0.050	0.59*	0.050	0.59*	0.050	0.44
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	0.00059	0.00050	ND	0.00050	0.00065	0.00050	ND	0.00050	ND
Chloride	9251	10	140	10	230	10	290	10	190	10	190	10	170	10	250	10	160	10	160	10	150
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	0.0047	0.0010	0.0034	0.0050	0.0062	0.0010	0.011	0.0010	0.0075	0.0010	0.0021	0.0010	0.0021	0.0010	0.0022	0.0010	0.0022	0.0010	0.002
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	0.0026	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.61	0.10	0.52	0.10	0.47	0.10	0.39	0.10	0.50	0.10	0.45	0.10	0.48	0.10	0.48	0.10	0.48	0.10	0.45
Iron	6020	0.10	ND	0.10	0.18	0.50	7.3	0.10	3.8	0.10	1.5	0.10	5.5	0.10	8.0	0.10	4.7	0.10	4.7	0.10	13
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	1.1	0.0025	1.6	0.013	0.95	0.0025	0.82	0.0025	0.66	0.0025	1.3	0.0025	1.2	0.0025	0.68	0.0025	0.68	0.0025	0.44
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0094	0.0020	0.0072	0.010	0.013	0.0020	0.014	0.0020	0.011	0.0020	0.0054	0.0020	0.0070	0.0020	0.010	0.0020	0.010	0.0020	0.0059
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	ND	0.10	0.97	0.10	0.36	0.10	0.22	0.10	ND	0.10	ND	0.10	0.22	0.10	0.22	0.10	0.22
Nitrogen/Nitrate, Nitric	SM 4500 NO3 F	0.10	ND*	0.10	ND	0.10	0.97	0.10	0.36	0.10	0.22	0.10	ND	0.10	ND	0.10	0.22	0.10	0.22	0.10	0.22
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.03	NA	7.19	NA	7.01	NA	6.90	NA	7.19	NA	6.86	NA	6.85	NA	6.82	NA	6.82	NA	6.80
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	250	1600	250	1100	100	580	130	750	50	130	500	1600	500	1500	250	1600	250	1600	250	1100
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	2600	10	2400	10	1500	10	1700	10	2400	10	2600	10	2800	10	2900	10	2900	10	2000
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 9.1 to 19.1 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

* - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-10		Date		12/6/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0012	0.0010	ND	0.0010	ND	0.0010	0.0012	0.0010	0.0010	0.0010
Barium	6020	0.0025	0.050	0.0025	0.051	0.0025	0.039	0.0025	0.039	0.0025	0.036	0.0025	0.040	0.0025	0.043	0.0025	0.040	0.0025	0.041	0.0025	0.041
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.50	0.050	0.54	0.050	0.54	0.050	0.41	0.050	0.52	0.25	0.52	0.050	0.53	0.050	0.43 ^a	0.050	0.49	0.050	0.49
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	200	10	300	2.0	7.1	10	170	10	180	10	180	10	290	10	230	10	200	10	200
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.43	0.10	0.39	0.10	0.42	0.10	0.41	0.10	0.45	0.10	0.41	0.10	0.46	0.10	0.50	0.10	0.47	0.10	0.47
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Manganese	6020	0.0025	0.12	0.0025	0.0076	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0052	0.0020	0.0029	0.010	ND	0.0020	0.0087	0.0020	0.0024	0.0020	ND	0.0020	ND	0.0020	0.0021	0.0020	0.0024	0.0020	0.0024
Nitrogen/Nitrate	Nitrogen Calc	0.10	0.39	0.10	2.3	0.10	2.7	0.10	2.6	0.10	1.4	0.10	ND	0.10	1.8	0.10	1.5	0.10	1.5	0.10	1.5
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	0.39	0.20	2.3	0.20	2.7	0.20	2.6	0.10	1.4	0.10	ND	0.10	1.8	0.10	1.5	0.10	1.5	0.10	1.5
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.65	NA	7.20	NA	7.40	NA	7.34	NA	7.51	NA	7.35	NA	7.20	NA	7.38	NA	7.38	NA	7.38
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	130	50	130	25	89	25	100	50	190	50	250	50	170	50	110	25	120	50	120
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	860	10	1100	10	980	10	730	10	890	10	890	10	1100	10	870	10	860	10	860
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 9.8 to 19.8 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

^a - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

Sample: MW-11		Date		12/6/2010		3/23/2011		6/14/2011		9/14/2011		12/7/2011		3/15/2012		6/19/2012		9/19/2012		12/20/2012	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Antimony	6020	0.0030	ND	0.0030	ND	0.015	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	0.0013	0.0010	0.0016	0.0050	ND	0.0010	0.0016	0.0010	0.0019	0.0010	0.0017	0.0010	0.0017	0.0010	0.0018	0.0010	0.0018	0.0010	0.0018
Barium	6020	0.0025	0.064	0.0025	0.076	0.013	0.051	0.0025	0.054	0.0025	0.057	0.0025	0.067	0.0025	0.046	0.0025	0.060	0.0025	0.063	0.0025	0.063
Beryllium	6020	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Boron	6020	0.050	0.47	0.050	2.6	0.050	2.2	0.050	1.1	0.050	1.2	0.25	1.4	0.050	0.85	0.050	0.68*	0.050	0.57	0.050	0.57
Cadmium	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Chloride	9251	10	160	10	270	10	280	10	86	10	140	10	240	10	150	10	150	10	140	10	140
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND
Cobalt	6020	0.0010	ND	0.0010	ND	0.0050	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Copper	6020	0.0020	ND	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Cyanide	9014	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.34	0.10	0.31	0.10	0.36	0.10	0.32	0.10	0.31	0.10	0.30	0.10	0.37	0.10	0.32	0.10	0.34	0.10	0.34
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND	0.10	ND	0.10	0.23	0.10	ND	0.10	0.42	0.10	0.42
Lead	6020	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	0.0008
Manganese	6020	0.0025	0.052	0.0025	0.0047	0.013	ND	0.0025	0.0053	0.0025	0.0047	0.0025	ND	0.0025	0.014	0.0025	ND	0.0025	0.042	0.0025	0.042
Mercury	7470A	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND	0.00020	ND
Nickel	6020	0.0020	0.0022	0.0020	ND	0.010	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	0.0025
Nitrogen/Nitrate	Nitrogen Calc	0.10	0.39	0.10	1.1	0.10	0.92	0.10	0.31	0.10	0.60	0.10	0.30	0.10	ND	0.10	0.36	0.10	0.46	0.10	0.46
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	0.39	0.10	1.1	0.10	0.92	0.10	0.31	0.10	0.60	0.10	0.30	0.10	ND	0.10	0.36	0.10	0.46	0.10	0.46
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.72	NA	7.23	NA	7.60	NA	7.38	NA	7.46	NA	7.38	NA	7.37	NA	7.36	NA	7.36	NA	7.36
Selenium	6020	0.0025	ND	0.0025	0.0054	0.013	ND	0.0025	0.0026	0.0025	0.0033	0.0025	0.0043	0.0025	0.0028	0.0025	ND	0.0025	ND	0.0025	ND
Silver	6020	0.00050	ND	0.00050	ND	0.0025	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND	0.00050	ND
Sulfate	9038	50	140	50	150	25	110	25	110	50	160	25	140	50	150	50	100	50	150	50	150
Thallium	6020	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND
Total Dissolved Solids	SM 2540C	10	770	10	1000	10	710	10	590	10	790	10	850	10	760	10	740	10	730	10	730
Zinc	6020	0.020	ND	0.020	ND	0.10	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND

Notes: Groundwater sample analyzed at TestAmerica laboratory.
Well screen depth is from 9.8 to 19.8 feet below ground surface.
Sample collected using low-flow technique.
All values are in mg/L (ppm).

DL - Detection limit
ND - Non-detect
NA - Not Applicable

* - Denotes instrument related QC exceeds the control limits

Table 2. Groundwater Analytical Results - Midwest Generation LLC, Joliet Station #29, Joliet, IL

12/20/2012	Sample	MW-01		MW-02		MW-03		MW-04		MW-05		MW-06		MW-07		MW-08		MW-09		MW-10		MW-11	
Parameter	Lab Method	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result	D.L.	Result
Benzene	8260B	0.0005	NS	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND
Ethylbenzene	8260D	0.0005	NS	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND
Toluene	8260B	0.0005	NS	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND	0.0005	ND
Xylenes, Total	8260B	0.0010	NS	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND
Vanadium, Dissolved	602D	0.0050	NS	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	0.0052	0.0050	0.0051	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	0.0050

Notes: Groundwater sample analyzed at TestAmerica laboratory.
 Sample collected using low-flow technique.
 Please see Table 1 for sample depths.
 All values are in mg/L (ppm).

DL - Detection limit
 ND - Non-detect

ATTACHMENT 2C
Compliance Commitment Agreement



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

September 28, 2012

CERTIFIED MAIL # 7010 2780 0002 1163 4888

RETURN RECEIPT REQUESTED

RECEIVED

OCT 05 2012

ENVIRONMENTAL SERVICES
MIDWEST GENERATION EME, LLC

John Kennedy
Senior Vice President, Generation
235 Remington, Suite A
Bolingbrook, IL 60440

**Re: Proposed Compliance Commitment Agreement
Violation Notice: W-2012-00059
Midwest Generation, LLC, Joliet #29 Generating Station; ID Number: 6284**

Dear Mr. Kennedy:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed the proposed Compliance Commitment Agreement ("CCA") terms submitted by Midwest Generation, LLC, Joliet #29 Generating Station in a letter dated August 31, 2012, in response to the Violation Notice dated June 11, 2012. Pursuant to the authority vested in the Illinois EPA under Section 31(a)(7)(i) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(7)(i), attached to this letter is a proposed CCA, which contains terms and conditions that the Illinois EPA has determined are necessary in order for you to attain compliance with the Act and Illinois Pollution Control Board Regulations [and conditions of Permit, if applicable].

Pursuant to Section 31(a)(7.5) of the Act, 415, ILCS 5/31(a)(7.5), **within 30 days of your receipt of this proposed CCA**, Midwest Generation, LLC, Joliet #29 Generating Station or its duly authorized representative must either (1) agree to and sign the proposed CCA, and submit the signed and dated CCA by certified mail to Illinois EPA Bureau of Water, Andrea Rhodes, MC #19, 1021 North Grand Ave East, Springfield, IL 62702; or (2) notify the Illinois EPA by certified mail that you reject the proposed CCA.

The proposed CCA shall only become effective upon your timely submittal of the signed CCA as discussed above, and upon final execution by the Illinois EPA. Failure by you to execute and submit the proposed CCA within 30 days of receipt shall be deemed a rejection of the CCA by operation of law. Upon timely receipt of the signed CCA, the Illinois EPA will send you a fully executed copy of the CCA for your records.

In addition, the proposed CCA is not subject to amendment or modification prior to execution by you and the Illinois EPA. Any amendment or modification to the proposed CCA by Respondent prior to execution by you and the Illinois EPA shall be deemed a rejection of the proposed CCA by operation of law. The proposed CCA may only be amended subsequent to its effective date, in writing, and by mutual agreement between the Illinois EPA and you.

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 10-300, Chicago, IL 60601 (312)814-6026

Questions regarding this matter should be directed to Illinois EPA, Bureau of Water, Andrea Rhodes at 217/785-0561. Written communications should be directed to Illinois EPA – DPWS, Attn: Andrea Rhodes, MC #19, 1021 North Grand Ave East, Springfield, IL 62702.

Sincerely,



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

Attachments

cc: Basil G. Constantelos
Maria Race
Susan M. Franzetti

BOW ID: W1970450047 CASE ID: 2012-006

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:)

MIDWEST GENERATION, LLC,)
JOLIET #29 GENERATING STATION)
JOLIET, WILL COUNTY, IL)
ID NUMBER: 6284)

) ILLINOIS EPA VN W-2012-00059
) BUREAU OF WATER
)

COMPLIANCE COMMITMENT AGREEMENT

I. Jurisdiction

1. This Compliance Commitment Agreement ("CCA") is entered into voluntarily by the Illinois Environmental Protection Agency ("Illinois EPA") and Midwest Generation, LLC, Joliet Generating Station ("Respondent") (collectively, the "Parties") under the authority vested in the Illinois EPA pursuant to Section 31(a)(7)(i) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(7)(i).

II. Allegation of Violations

2. Respondent owns and operates Joliet #29 a power generating station in Joliet, Will County, Illinois ("Joliet #29").
3. Pursuant to Violation Notice ("VN") W-2012-00059 issued on June 11, 2012, the Illinois EPA contends that Respondent has violated the following provisions of the Act and Illinois Pollution Control Board ("Board") Regulations:
 - a) Operations at ash impoundments have resulted in violations of the Groundwater Quality Standards at monitoring wells MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, and MW-11.
Section 12 of the Act, 415 ILCS 5/12, 35 Ill. Adm. Code 620.115, 620.301, 620.401, 620.405, and 620.410.

III. Compliance Activities

4. On August 31, 2012, the Illinois EPA received Respondent's response to VN W-2012-00059, which included proposed terms for a CCA. The Illinois EPA has reviewed Respondent's proposed CCA terms, as well as considered whether any additional terms and conditions are necessary to attain compliance with the alleged violations cited in the VN.
5. Respondent agrees to undertake and complete the following actions, which the Illinois EPA has determined are necessary to attain compliance with the allegations contained in VN W-2012-00059:
 - a) The ash ponds at Joliet #29 shall not be used as permanent disposal sites and shall continue to function as treatment ponds to precipitate ash. Ash shall continue to be removed from the ponds on a periodic basis.
 - b) The ash treatment ponds shall be maintained and operated in a manner which protects the integrity of the existing liners. During the removal of ash from the ponds, appropriate procedures shall be followed to protect the integrity of the existing liners, including operating the ash removal equipment in a manner which minimizes the risk of any damage to the liner.
 - c) During the ash removal process, visual inspections of the ponds shall be conducted to identify any signs of a breach in the integrity of the pond liners. In the event that a breach of the pond liners is detected, Midwest Generation shall promptly notify the Illinois EPA and shall implement a corrective action plan for repair or replacement as necessary, of the liner. Upon the Illinois EPA's approval, and the issuance of any necessary construction permit, Midwest Generation will implement the corrective action plan.
 - d) Midwest Generation shall continue quarterly monitoring of the existing eleven groundwater monitoring wells for constituents in 35 Ill. Adm. Code 620.410(a), with the exception of radium 226 and 228, and report its findings to the Illinois EPA within 30 days of the end of each quarter. In addition, Midwest Generation shall record and report groundwater elevation and submit a potentiometric surface map with the above quarterly groundwater monitoring report.
 - e) Midwest Generation shall submit an application for a construction permit to re-line Pond #3 with a high density polyethylene ("HDPE") liner within 90 days of the effective date of the CCA. A groundwater monitoring schedule shall be included in the construction permit.
 - f) Midwest Generation shall submit an application to establish a Groundwater Management Zone ("GMZ") pursuant to 35 Ill. Adm. Code Part 620.250 within 90 days of the effective date of the CCA.

- g) Midwest Generation shall establish a GMZ pursuant to 35 Ill. Adm. Code Part 620.250 within one year of the effective date of the CCA.
- h) Once Pond #3 has been re-lined with a HDPE liner and a GMZ has been established, Midwest Generation, shall submit a certification (or a statement) of compliance. Midwest Generation may submit either the attached "Illinois EPA Compliance Statement" or another similar writing to satisfy the statement of compliance within one year of the effective date of the CCA.

IV. Terms and Conditions

- 6. Respondent shall comply with all provisions of this CCA, including, but not limited to, any appendices to this CCA and all documents incorporated by reference into this CCA. Pursuant to Section 31(a)(10) of the Act, 415 ILCS 5/31(a)(10), if Respondent complies with the terms of this CCA, the Illinois EPA shall not refer the alleged violations that are the subject of this CCA, as described in Section II above, to the Office of the Illinois Attorney General or the State's Attorney of the county in which the alleged violations occurred. Successful completion of this CCA or an amended CCA shall be a factor to be weighed, in favor of the Respondent, by the Office of the Illinois Attorney General in determining whether to file a complaint on its own motion for the violations cited in VN W-2012-00059.
- 7. This CCA is solely intended to address the violations alleged in Illinois EPA VN W-2012-00059. The Illinois EPA reserves and this CCA is without prejudice to, all rights of the Illinois EPA against Respondent with respect to noncompliance with any term of this CCA, as well as to all other matters. Nothing in this CCA is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the Illinois EPA may have against Respondent, or any other person as defined by Section 3.315 of the Act, 415 ILCS 5/3.315. This CCA in no way affects the responsibilities of Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act, and the Board Regulations [and Permit, if applicable].
- 8. Pursuant to Section 42(k) of the Act, 415 ILCS 5/42(k), in addition to any other remedy or penalty that may apply, whether civil or criminal, Respondent shall be liable for an additional civil penalty of \$2,000 for violation of any of the terms or conditions of this CCA.
- 9. This CCA shall apply to and be binding upon the Illinois EPA, and on Respondent and Respondent's officers, directors, employees, agents, successors, assigns, heirs, trustees, receivers, and upon all persons, including but not limited to contractors and consultants, acting on behalf of Respondent, as well as upon subsequent purchasers of Respondent's Joliet #29 in Joliet, Will County, Illinois.

10. In any action by the Illinois EPA to enforce the terms of this CCA, Respondent consents to and agrees not to contest the authority or jurisdiction of the Illinois EPA to enter into or enforce this CCA, and agrees not to contest the validity of this CCA or its terms and conditions.
11. This CCA shall only become effective:
- a) If, within 30 days of receipt, Respondent executes this CCA and submits it, via certified mail, to Illinois EPA, Bureau of Water, Andrea Rhodes, MC #19, 1021 North Grand Ave East, Springfield, IL 62702. If Respondent fails to execute and submit this CCA within 30 days of receipt, via certified mail, this CCA shall be deemed rejected by operation of law; and
 - b) Upon execution by all Parties.
12. Pursuant to Section 31(a)(7.5) of the Act, 415 ILCS 5/31(a)(7.5), this CCA shall not be amended or modified prior to execution by the Parties. Any amendment or modification to this CCA by Respondent prior to execution by all Parties shall be considered a rejection of the CCA by operation of law. This CCA may only be amended subsequent to its effective date, in writing, and by mutual agreement between the Illinois EPA and Respondent's signatory to this CCA, Respondent's legal representative, or Respondent's agent.

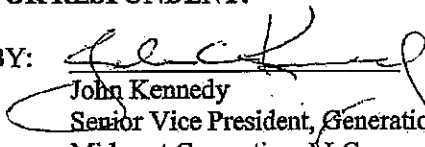
AGREED:

FOR THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY:

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

DATE: _____

FOR RESPONDENT:

BY: 
John Kennedy
Senior Vice President, Generation
Midwest Generation, LLC

DATE: Oct 15, 2012

Illinois EPA Compliance Statement

The owner of the facility must acknowledge that all compliance commitment agreement (CCA) measures have been successfully completed.

Please complete, sign, and return.

I _____ (*print name*), hereby certify that all violations addressed in Violation Notice (VN) number _____ have been addressed and that all CCA measures were completed on _____ (*date*).

Signature

Title

Telephone Number

Date

Be sure to retain copies of this document for your files. Should you need additional notification forms, please contact this office at (217)785-0561. Return this completed form to:

Illinois Environmental Protection Agency
Compliance Assurance Section #19
Bureau of Water
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

"Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Agency,related to or required by this Act, a regulation adopted under this Act, any federal law or regulation for which the Agency has responsibility, or any permit, term, or condition thereof, commits a Class 4 felony..." (415 ILCS 5/44(h) (8))



**MIDWEST
GENERATION EME, LLC**

An EDISON INTERNATIONAL® Company

Amy L. Hanrahan
Senior Environmental
Engineer
Environmental Services

January 18, 2013

Ms. Andrea Rhodes
Illinois Environmental Protection Agency – DPWS
MC #19
1021 North Grand Avenue East
Springfield, IL 62702

VIA FEDERAL EXPRESS

Re: Compliance Commitment Agreement – ELUC
Midwest Generation, LLC, Powerton Station; ID No. 6282
Violation Notice W-2012-00057

Dear Ms. Rhodes:

The Compliance Commitment Agreement (CCA) for the above referenced site relative to Violation Notice W-2012-00057 was signed by Midwest Generation on October 15, 2012 and executed by Illinois Environmental Protection Agency (IEPA) signature on October 24, 2012 (effective date). Item 5 (h) of the CCA requires that Midwest Generation submit a proposed Environmental Land Use Control (ELUC) to cover the area of the proposed Groundwater Management Zone (GMZ; application provided under separate cover). The proposed ELUC is to be submitted to IEPA within 90 days of the effective date of the CCA.

Attached is a proposed ELUC for the Powerton Station. Please note that the formal legal description that would be included as part of Exhibit A will be completed upon IEPA approval of the proposed ELUC.

The areal extent of the proposed ELUC is provided with the attached documentation (Exhibit B/Figure B-5). Groundwater flow within the silt/clay unit in the vicinity of the subject ash basins is in a westerly direction with discharge to the adjoining intake channel and groundwater flow within the gravelly sand unit is to the north with discharge to the Illinois River. The western (downgradient) extent of the proposed GMZ corresponds with the hydraulic boundary formed by the intake channel. The northern extent corresponds with the hydraulic boundary formed by the Illinois River. The southern and eastern boundaries are defined by the property boundary. The vertical extent of the GMZ would be defined by the top of the Carbondale Formation which is estimated to be approximately 70 feet below ground surface based on other site boring logs from other portions of the property.

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