



**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, Will County Generating Station; ID No. 6283  
Violation Notice W-2012-0058

Dear Ms. Rhodes:

The Compliance Commitment Agreement (CCA) for the above referenced site relative to Violation Notice W-2012-00058 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 (g) 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 westerly direction with discharge to the adjoining Des Plaines River. The western (downgradient) extent of the proposed GMZ corresponds with this hydraulic boundary. The eastern boundary is defined by the Chicago Sanitary and Ship Canal (CSSC) which forms a hydraulic boundary on the east side of the facility. The north and south sides of the proposed GMZ are based on the flow system and location of the four ash ponds. The vertical extent of the GMZ would be the first underlying aquitard identified as the Maquoketa Shale, approximately 140 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.

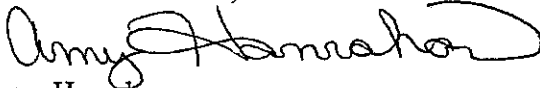
235 Remington Blvd.  
Suite A  
Bolingbrook, IL 60440  
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Fax: 949 225 0813  
ahanrahan@mwgen.com

MWG13-15\_622

Comp. Ex. 276

This submittal fulfills the requirements set forth under Item 5 (g) 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

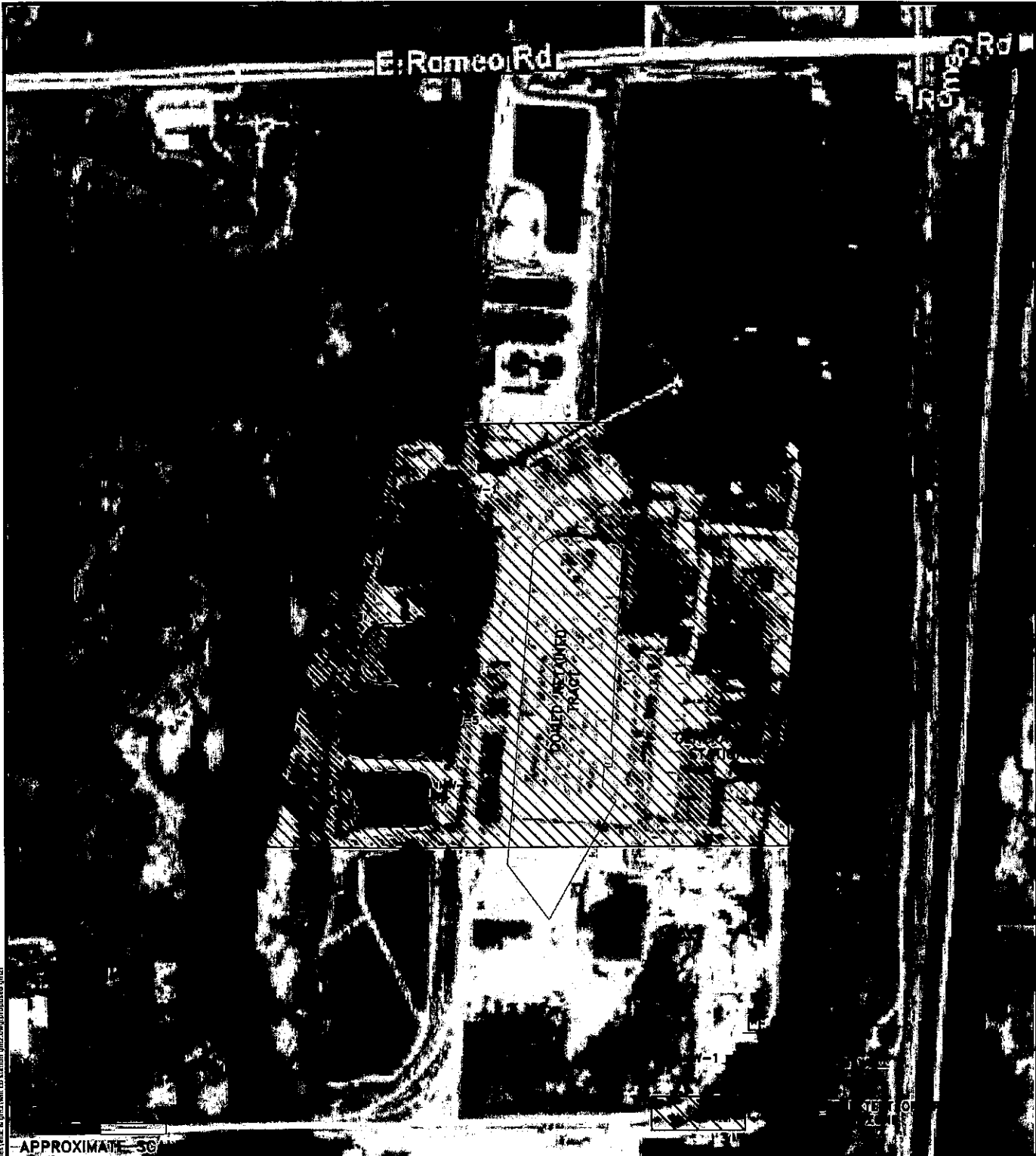


Amy Hanrahan  
Senior Environmental Engineer

*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  
Ms. Rebecca Maddox, 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**



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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

PROPOSED GROUNDWATER MANAGEMENT ZONE

WILL COUNTY STATION  
ROMEDEVILLE, ILLINOIS

Scale: 1" = 500'

Date: January 11, 2013

KPRG Project No. 18311.41

FIGURE 1

**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 Will County Generating Station

Facility Address 529 East 135<sup>th</sup> Street  
Romeoville, IL

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 Will County Station is a coal-fired electrical power generating station in operation since the mid-1950s. The facility is located at 529 E. 135<sup>th</sup> Street in Romeoville, Illinois. The generating station property covers an area of approximately 200 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>          </u>	<u>  X  </u>
Surface Impoundment	<u>  X  </u>	<u>          </u>
Land Treatment	<u>          </u>	<u>  X  </u>
Spray Irrigation	<u>          </u>	<u>  X  </u>
Waste Pile	<u>  X  </u>	<u>          </u>
Incinerator	<u>          </u>	<u>  X  </u>
Storage Tank (above ground)	<u>  X  </u>	<u>          </u>
Storage Tank (underground)	<u>          </u>	<u>  X  </u>
Container Storage Area	<u>  X  </u>	<u>          </u>
Injection Well	<u>          </u>	<u>  X  </u>
Water Treatment Units	<u>  X  </u>	<u>          </u>
Septic Tanks	<u>          </u>	<u>  X  </u>
French Drains	<u>          </u>	<u>  X  </u>
Transfer Station	<u>          </u>	<u>  X  </u>
Other Units (please describe)	<u>          </u>	<u>          </u>
<u>                                  </u>	<u>          </u>	<u>          </u>
<u>                                  </u>	<u>          </u>	<u>          </u>

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.

Will County Generating Station generates typical hazardous and non-hazardous substance wastes associated with coal-fired electrical power generation. A full list of hazardous substances can be provided upon request.

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.

The station's hazardous wastes have typically been lead paint chip debris associated with lead paint removal, empty aerosol cans, spent laboratory chemicals (hydrazine, monoethylamine, formic acid), etc. Complete logs of wastes generated and disposed of can be provided upon request.

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 for start-up operations and for heavy equipment fueling and other diesel powered equipment. There is also an above ground gasoline storage tank and two used oil storage tanks.

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. IL0002208.

- 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 four ash impoundments alleging a potential release of coal ash constituents to groundwater (Violation Notice No. W-2012-00058). This was resolved through a Compliance Commitment Agreement (CCA) dated October 4, 2012 and formally executed on October 24, 2012. This submittal is part of the CCA compliance.

- b. Consent Decree or Order under RCRA, CERCLA, EPA Act Section 22.2 (State Superfund), or EPA Act 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 \_\_\_

The CCA is currently in effect.

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 Pond 1N, 1S, 2S and 3S located on the west side of the facility. A total of ten monitoring wells were installed around the four 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-2012-00058) to Midwest Generation alleging that potential leakage from the ponds has resulted in a violation of Class I groundwater standards for antimony, boron, chloride, manganese, pH, 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.

Will County Generating Station

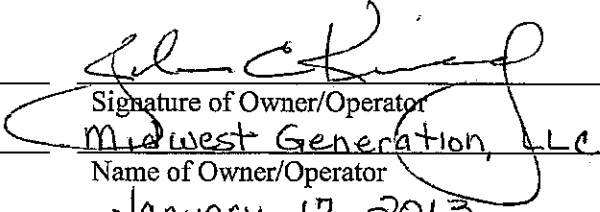
Facility Name

Romeoville, IL

Location of Facility

ID No. 6283

EPA Identification Number

  
Signature of Owner/Operator

Midwest Generation, LLC

Name of Owner/Operator

January 17, 2013

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
pH	Not Applicable
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 four ash ponds located at the Will County 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 ten monitoring wells (MW-1 through MW-10) were installed around the four ash ponds identified as Ash Ponds 1N, 1S, 2S and 3S (see Figure 3 in Attachment 2A). The wells were drilled and constructed in October 2010 after which point quarterly monitoring was initiated in accordance with approved, low-flow sampling procedures. A Hydrogeologic Assessment Report for Will County Generating Station 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 table is provided 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 five of the monitoring wells (MW-1, MW-4, MW-6, MW-7 and MW-9) 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  $6.38 \times 10^{-5}$  to  $2.07 \times 10^{-4}$  ft/sec with an average hydraulic conductivity of  $4.32 \times 10^{-4}$  ft/sec. Using the average hydraulic conductivity value, an estimated hydraulic gradient of 0.015 ft/ft based on the most recent groundwater contour map (Figure 4 in Attachment 2A) and an estimated effective porosity of 0.20 yields an estimated groundwater seepage velocity of approximately 2.8 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 generally to the west with discharge into the adjacent Des Plaines River. There are some instances when there could be flow to the east from the river onto the property at times of higher river stage.

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 ten monitoring wells (MW-1 through MW-10) located around the four existing ash ponds (see Figure 1 in Attachment 2A). Wells MW-1 through MW-6 are generally upgradient monitoring wells. The remaining wells are considered downgradient monitoring points. The well borings were advanced using hollow-stem augers to depths ranging from approximately 18 to 22 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 low-flow sampling with a peristaltic pump. 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 <sup>st</sup> Quarter	March
2 <sup>nd</sup> Quarter	June
3 <sup>rd</sup> Quarter	September
4 <sup>th</sup> 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*, 18<sup>th</sup> Edition, 19<sup>th</sup>, 20<sup>th</sup>, 21<sup>st</sup> 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 are 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.

Will County Generating Station

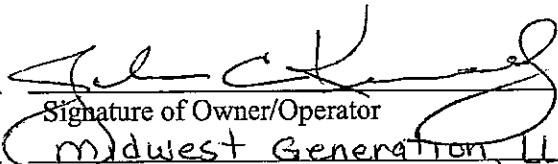
Facility Name

Romeoville, IL

Location of Facility

ID No. 6283

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 Pond 1S is already lined with high density polyethylene (HDPE) and the remaining three ash ponds have a Poz-o-Pac liner. The agreed upon remedy is specified in Item 5 (a) through (j) of the executed Compliance Commitment Agreement (CCA) which is provided in Attachment 2C. The remedy includes relining of Ash Pond 2S with HDPE, removing Ash Ponds 1S and 1N from service and installing a dewatering system within those ponds to keep liquid levels to within no more than one foot of the bottoms of those units. This Groundwater Management Zone (GMZ) application fulfills requirements set forth under Item 5 (g) 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 2S to facilitate new liner construction will be taken by Lafarge NA for beneficial reuse.

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

Once Ash Pond 2S is relined with a HDPE liner, the two ponds that will remain in service for active ash accumulation will have been constructed and operated to minimize potential release of ash pond fluids to groundwater. In addition, the fluid accumulation within Ash Ponds 1S and 1N, which will no longer accumulate ash,



will be managed to within one foot of the bottom of each pond to further minimize potential release of ash pond fluids from these units. 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 eventual discharge to the adjoining Des Plaines River.

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 2S is relined with an HDPE liner and the fluid level within Ash Ponds 1S and 1N is reduced to within no more than one foot of the pond bottoms, the ash collection system 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 adjoining Des Plaines River immediately west 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 of Ash Pond 2S will occur from June 14, 2013 through September 2, 2013. Dredging will occur from June 14, 2013 through July 28, 2013. At this time liner installation is anticipated to occur in August 2013.

The dewatering system for Ash Ponds 1S and 1N is anticipated to be completed between July 14, 2013 and September 2, 2013.

A more detailed schedule is being provided under separate cover with the Application for Construction Permit to implement the remedy.

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 and dewatering 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 10 monitoring wells surrounding Ash Ponds 1S, 2S, 3S and 1N (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) and (d), 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.

: Will County Generating Station


Facility Name

Romeoville, IL

Location of Facility

ID No. 6283

EPA Identification Number

  
Signature of Owner/Operator

Midwest Generation, LLC

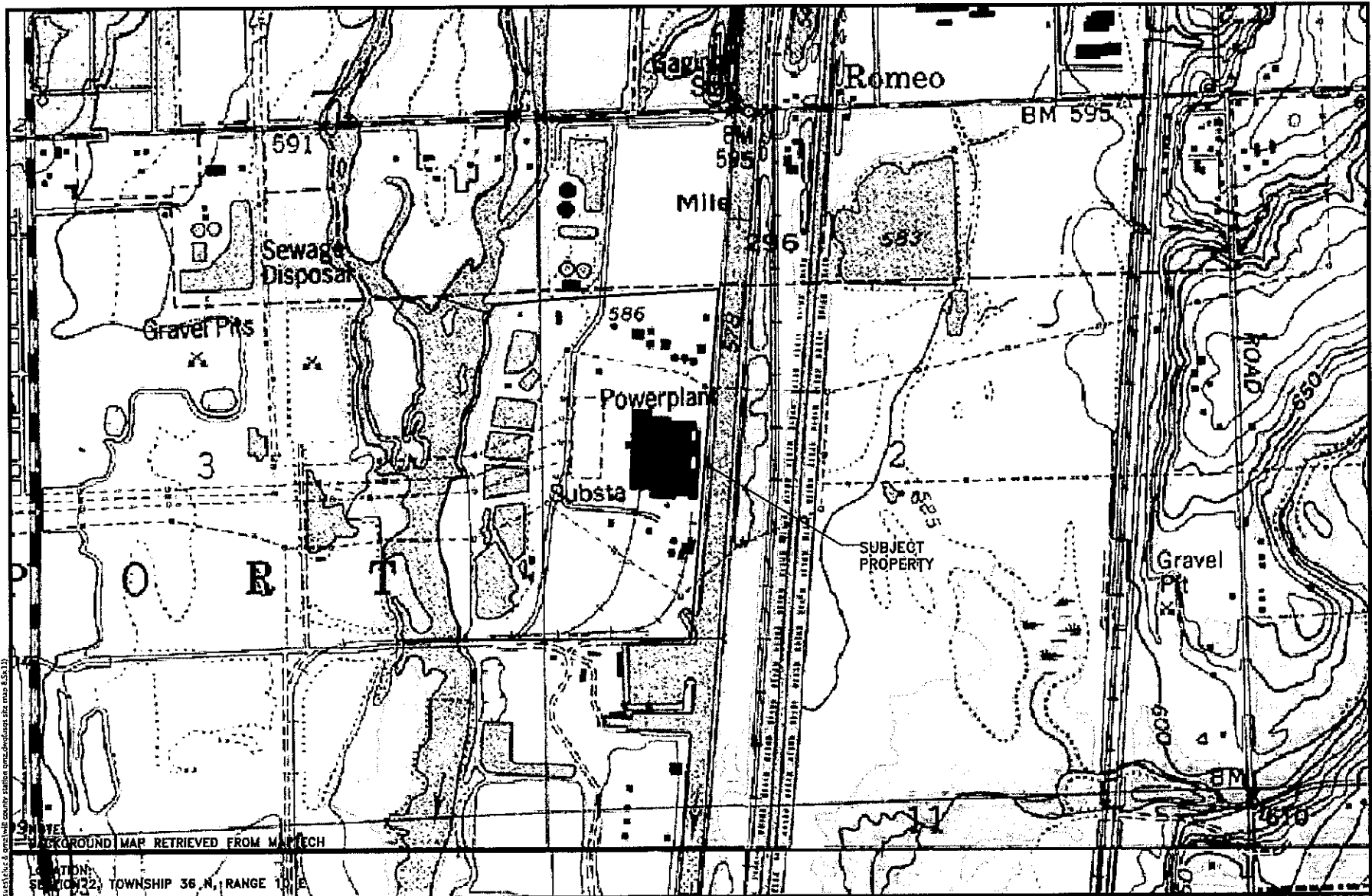
Name of Owner/Operator

January 17, 2013

Date

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

**ATTACHMENT 2A**  
**Figures**



NOTE: BACKGROUND MAP RETRIEVED FROM MAPTECH

LOCATION: SECTION 22, TOWNSHIP 36 N., RANGE 10 E.



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

USGS TOPOGRAPHIC SITE MAP

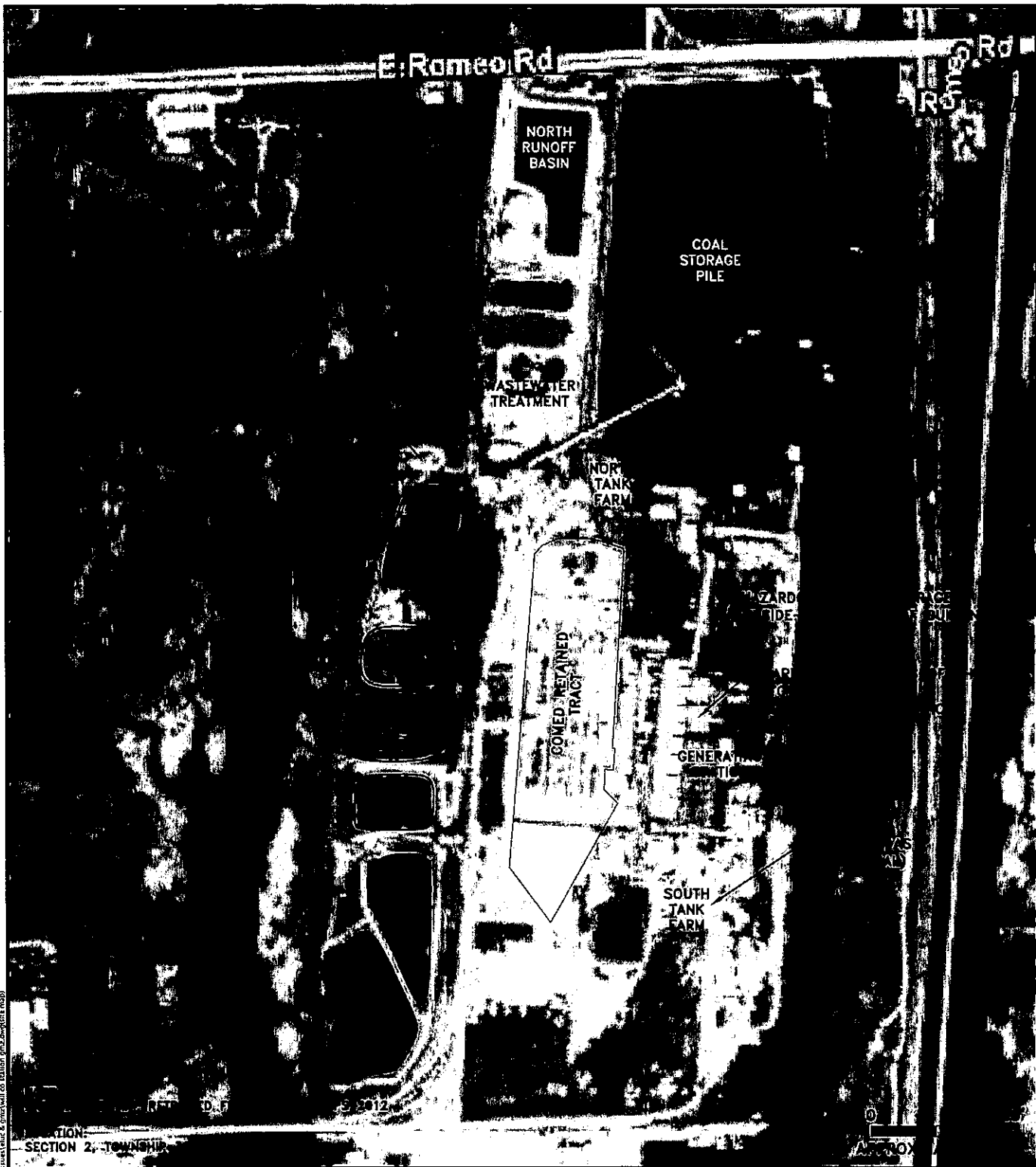
WILL COUNTY STATION  
ROMEOWILLE, ILLINOIS

Scale: 1" = 1,000' Date: January 9, 2013

KPRG Project No. 18311.41

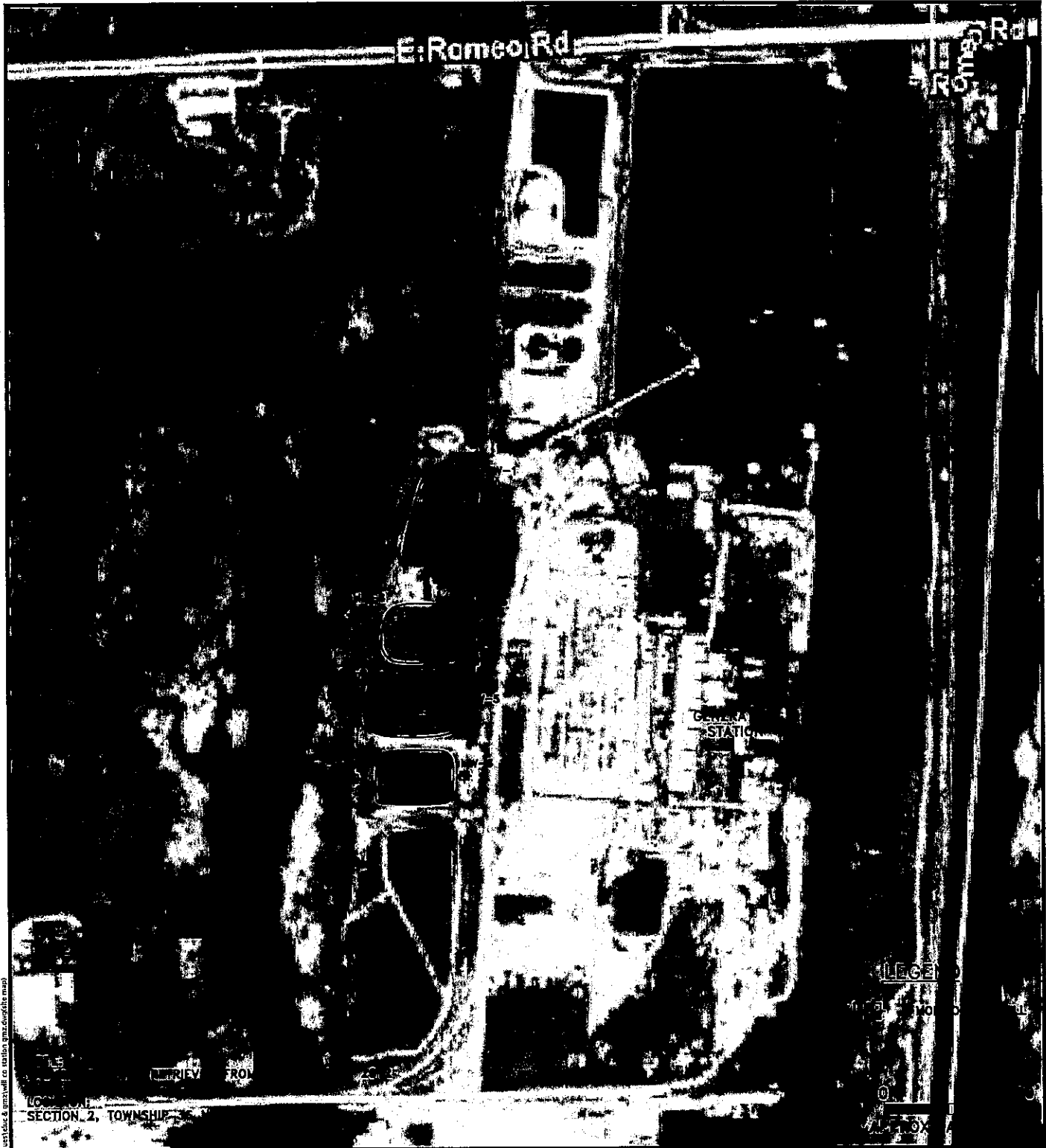
FIGURE 1

749 CI-115MM  
www.kprg.com  
Environmental Remediation Services, Inc. 2013-01-09 10:00 AM



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ENVIRONMENTAL CONSULTATION & REMEDIATION		GENERATING STATION SITE MAP	
<h1>K P R G</h1> KPRG and Associates, inc.		WILL COUNTY STATION ROMEOVILLE, ILLINOIS	
414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593		Scale: 1" = 500'	Date: January 11, 2013
14665 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478		KPRG Project No. 18311.41	FIGURE 2



KPRG and Associates, Inc. 14565 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

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

14565 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

**MONITORING WELLS LOCATION SITE MAP**

WILL COUNTY STATION  
ROMEIOVILLE, ILLINOIS

Scale: 1" = 500' Date: January 9, 2013

KPRG Project No. 18311.41 FIGURE 3

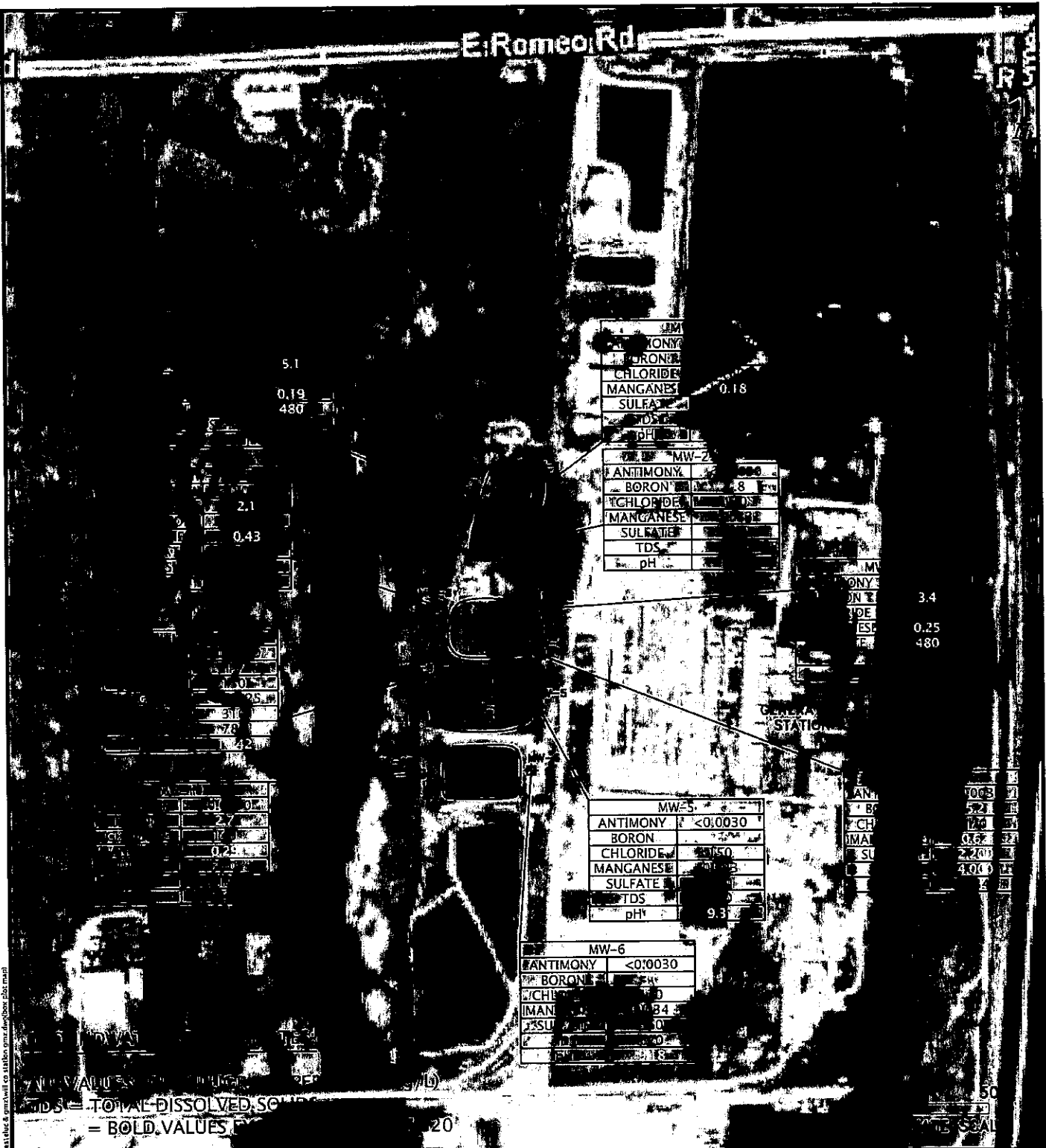


Will County Station Remediation Project - Groundwater Contour Map - 12/18/12

ENVIRONMENTAL CONSULTATION & REMEDIATION		GROUNDWATER CONTOUR MAP 12/18/12	
<h1>K P R G</h1> KPRG and Associates, Inc.		WILL COUNTY STATION ROMEOVILLE, ILLINOIS	
414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593		Scale: 1" = 250'	Date: January 9, 2013
14665 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478		KPRG Project No. 18311.41	FIGURE 4



E. Romeo Rd



This is a preliminary report and should not be used for legal or regulatory purposes without the approval of KPRG and Associates, Inc.

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 2B Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

AREAL DISTRIBUTION OF GROUNDWATER IMPACTS

WILL COUNTY STATION  
ROMEOVILLE, ILLINOIS

Scale: 1" = 500' Date: January 17, 2013

KPRG Project No. 18311.41

FIGURE 5

**ATTACHMENT 2B**  
**Summary Data Table**

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

Sample: MW-01		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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 <sup>^</sup>	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	0.0063	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	0.050	0.0025	0.041	0.0025	0.046	0.0025	0.038	0.0025	0.033	0.0025	0.033	0.0025	0.039	0.0025	0.035	0.0025	0.034	0.0025	0.034
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	0.25	1.8	0.050	1.6	0.050	1.8	0.050	1.7	0.050	1.6	0.25	1.5	0.50	2.1	0.25	1.9	0.50	1.9	0.50	1.9
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	110	10	210	10	110	10	120	10	140	10	190	10	170	10	120	10	160	10	160
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	0.0011	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	0.71	0.10	0.65	0.10	0.53	0.10	0.77	0.10	0.73	0.10	0.69	0.10	0.77	0.10	0.86	0.10	0.86	0.10	0.86 <sup>^</sup>
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	0.11	0.10	0.11	0.10	ND	0.10	0.23	0.10	0.33	0.10	0.20	0.10	0.20
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	0.20	0.0025	0.15	0.013	0.22	0.0025	0.16	0.0025	0.17	0.0025	0.16	0.0025	0.16	0.0025	0.15	0.0025	0.18	0.0025	0.18
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	0.0046	0.0020	0.0038	0.010	ND	0.0020	0.0029	0.0020	0.0040	0.0020	0.0042	0.0020	0.0041	0.0020	0.0043	0.0020	0.0052	0.0020	0.0052
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	1.1	0.10	0.73	0.10	0.33	0.10	1.4	0.10	2.2	0.10	0.61	0.10	0.25	0.10	1.5	0.10	1.5
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	1.1	0.10	0.73	0.10	0.37	0.10	1.4	0.20	2.2	0.10	0.61	0.10	0.25	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	0.042	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	7.89	NA	8.05	NA	7.28	NA	7.57	NA	7.16	NA	7.84	NA	7.55	NA	7.70	NA	7.79	NA	7.79
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	0.0053	0.0025	0.0025	0.0025	0.0033	0.0025	0.0040	0.0025	ND	0.0025	ND	0.0025	ND
Silver	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
Sulfate	9038	100	530	100	390	100	280	50	320	100	270	100	430	100	390	100	390	100	390	100	290
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	1100	10	1100	10	760	10	770	10	910	10	950	10	790	10	880	10	880
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	0.040	0.020	0.040	0.020	0.040

Notes: Groundwater sample analyzed at TestAmerica Laboratory.  
Well screen depth is from 9.0 to 19.0 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

<sup>^</sup> - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

Sample: MW-02		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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	0.0073	0.0030	0.017	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND	0.0030	ND
Arsenic	6020	0.0010	0.0052	0.0010	0.0032	0.0050	ND	0.0010	0.0080	0.0010	0.0058	0.0010	0.0048	0.0010	0.0044	0.0010	0.0071	0.0010	0.0010	0.0010	0.0046
Barium	6020	0.0025	0.061	0.0025	0.068	0.013	0.068	0.0025	0.048	0.0025	0.048	0.0025	0.058	0.0025	0.062	0.0025	0.050	0.0025	0.050	0.0025	0.051
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	0.25	1.8	0.25	1.7	0.050	2.3	0.050	2.3	0.050	1.7	0.25	1.7	0.50	2.0	0.25	2.2	0.50	2.2	0.50	1.8
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	110	10	250	10	180	10	110	10	120	10	140	10	150	10	110	10	110	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	0.62	0.10	0.50	0.10	0.42	0.10	0.59	0.10	0.59	0.10	0.46	0.10	0.55	0.10	0.71	0.10	0.71	0.10	0.60 ^
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	0.032	0.0025	0.032	0.013	0.043	0.0025	0.036	0.0025	0.031	0.0025	0.031	0.0025	0.038	0.0025	0.029	0.0025	0.029	0.0025	0.033
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	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	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
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	8.62	NA	8.62	NA	8.00	NA	8.11	NA	7.80	NA	8.34	NA	8.23	NA	8.33	NA	8.33	NA	8.40
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	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	100	430	100	280	50	400	50	330	50	220	50	330	100	340	50	280	50	280	50	250
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	870	10	970	10	900	10	720	10	650	10	810	10	850	10	690	10	690	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 12.0 to 22.0 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, Will County Station, Romeoville, IL

Sample: MW-03		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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 <sup>^</sup>	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	0.0020	0.0010	0.0024	0.0050	ND	0.0010	0.0025	0.0010	0.0018	0.0010	0.0017	0.0010	0.0020	0.0010	0.0026	0.0010	0.0025	0.0010	0.0019
Barium	6020	0.0025	0.084	0.0025	0.086	0.013	0.071	0.0025	0.079	0.0025	0.083	0.0025	0.075	0.0025	0.12	0.0025	0.085	0.0025	0.079		
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	0.25	2.7	0.25	2.4	0.050	2.6	0.050	3.3	0.050	2.8	0.25	2.7	0.50	3.1	0.25	3.9	0.50	3.4		
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	2.0	54	10	250	10	100	10	130	10	100	10	95	10	88	10	96	10	100		
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	0.0022	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	0.50	0.10	0.37	0.10	0.36	0.10	0.45	0.10	0.39	0.10	0.38	0.10	0.36	0.10	0.45	0.10	0.44 <sup>^</sup>		
Iron	6020	0.10	0.37	0.10	0.57	0.50	ND	0.10	0.26	0.10	0.19	0.10	0.20	0.10	0.34	0.10	0.21	0.10	0.20		
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	0.34	0.0025	0.31	0.013	0.34	0.0025	0.26	0.0025	0.29	0.0025	0.27	0.0025	0.37	0.0025	0.24	0.0025	0.25		
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	0.0054	0.0020	0.0037	0.010	ND	0.0020	0.0061	0.0020	0.0053	0.0020	0.0052	0.0020	0.0051	0.0020	0.0069	0.0020	0.0079		
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	ND	0.10	0.81	0.10	ND	0.10	0.54	0.10	ND	0.10	0.18	0.10	ND	0.10	ND	0.10	ND
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	ND	0.10	0.81	0.10	ND	0.10	0.54	0.10	ND	0.10	0.18	0.10	ND <sup>^</sup>	0.10	ND	0.10	ND
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	7.21	NA	7.72	NA	7.01	NA	7.18	NA	6.55	NA	7.24	NA	6.79	NA	7.12	NA	7.21		
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	0.0033	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0040	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	100	330	50	270	50	240	100	250	100	280	100	320	100	500	100	440	100	480		
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	940	10	1000	10	990	10	1000	10	930	10	1000	10	1400	10	1100	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 7.0 to 17.0 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

<sup>^</sup> - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

Sample: MW-04		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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	0.0027	0.0010	0.0016	0.0050	ND	0.0010	0.0041	0.0010	0.0016	0.0010	0.0015	0.0010	0.0028	0.0010	0.0044	0.0020	0.0033		
Barium	6020	0.0025	0.068	0.0025	0.062	0.013	0.050	0.0025	0.050	0.0025	0.043	0.0025	0.036	0.0025	0.041	0.0025	0.041	0.0050	0.037		
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	0.0020	ND		
Boron	6020	0.25	3.7	0.25	3.3	0.050	3.6	0.050	4.3	0.050	3.0	0.25	4.0	0.50	5.3	0.25	6.2	0.10	5.2		
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	0.0010	ND		
Chloride	9251	10	120	10	190	10	120	10	170	10	150	10	150	10	140	10	170	10	170		
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	0.010	ND		
Cobalt	6020	0.0010	0.0011	0.0010	ND	0.0050	ND	0.0010	0.0012	0.0010	ND	0.0010	ND	0.0010	ND	0.0010	ND	0.0020	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	0.0040	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		
Fluoride	SM 4500 F C	0.10	0.52	0.10	0.49	0.10	0.48	0.10	0.53	0.10	0.55	0.10	0.50	0.10	0.62	0.10	0.68	0.10	0.63	0.10	0.63 ^
Iron	6020	0.10	0.83	0.10	0.78	0.50	0.70	0.10	1.2	0.10	0.64	0.10	0.53	0.10	0.95	0.10	0.83	0.20	1.2		
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	0.0010	ND		
Manganese	6020	0.0025	0.52	0.0025	0.58	0.013	0.70	0.0025	1.0	0.0025	0.62	0.0025	0.60	0.0025	0.70	0.0025	0.99	0.0050	0.62		
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	0.0048	0.0020	0.0041	0.010	ND	0.0020	0.0051	0.0020	0.0047	0.0020	0.0048	0.0020	0.0047	0.0020	0.0046	0.0040	0.0050		
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	ND	0.10	0.19	0.10	ND	0.10	0.37	0.10	0.45	0.10	ND	0.10	ND	0.10	ND		
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	ND	0.10	0.19	0.10	ND	0.10	0.37	0.10	0.45	0.10	ND	0.10	ND^	0.10	ND		
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		
pH	Obtained in field	NA	7.37	NA	7.66	NA	7.23	NA	7.21	NA	6.58	NA	7.27	NA	7.10	NA	7.29	NA	7.34		
Selenium	6020	0.0025	ND	0.0025	0.0033	0.013	ND	0.0025	ND	0.0025	0.0086	0.0025	0.0067	0.0025	ND	0.0025	0.0026	0.0050	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	0.0010	ND		
Sulfate	9038	250	1500	500	1500	250	1600	1000	4800	500	1600	500	2000	500	2800	500	3200	500	2200		
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	2500	10	2600	10	2800	25	6000	13	3100	13	3700	25	4300	17	4400	17	4000		
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	0.040	ND		

Notes: Groundwater sample analyzed at TestAmerica laboratory.  
Well screen depth is from 9.5 to 19.5 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, Will County Station, Romeoville, IL

Sample: MW-05		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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 <sup>^</sup>	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	0.0066	0.0010	0.0048	0.0050	ND	0.0010	0.0025	0.0010	0.0065	0.0010	0.0065	0.0010	0.0073	0.0010	0.0023	0.0010	0.0058	0.0010	0.0058
Barium	6020	0.0025	0.051	0.0025	0.060	0.013	0.067	0.0025	0.070	0.0025	0.061	0.0025	0.053	0.0025	0.040	0.0025	0.073	0.0025	0.045	0.0025	0.045
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	0.25	2.6	0.25	2.7	0.050	3.2	0.050	4.0	0.050	3.2	0.25	2.9	0.50	2.3	0.25	3.8	0.50	2.5	0.50	2.5
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	110	10	150	10	140	10	150	10	130	10	170	10	150	10	160	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	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	0.41	0.10	0.40	0.10	0.46	0.10	0.49	0.10	0.38	0.10	0.42	0.10	0.59	0.10	0.44	0.10	0.47 <sup>^</sup>	0.10	0.47 <sup>^</sup>
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	0.0079	0.0025	0.0067	0.013	0.055	0.0025	0.13	0.0025	0.038	0.0025	0.032	0.014	0.0025	0.073	0.0025	0.023	0.0025	0.023	0.023
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	ND	0.0020	0.0025	0.0020	0.0020
Nitrogen/Nitrate	Nitrogen Calc	0.10	0.27	0.10	1.6	0.10	1.1	0.10	0.11	0.10	1.0	0.10	0.11	0.10	0.24	0.10	0.11	0.10	ND	0.10	ND
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	0.27	0.10	1.9	0.10	0.97	0.10	0.11	0.10	1.2	0.10	0.25	0.10	0.27	0.10	0.11	0.10	1.2	0.10	1.2
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.10	0.31	0.020	0.13	0.020	ND	0.020	0.17	0.020	0.14	0.020	0.031	0.020	ND	0.20	1.2	0.20	1.2
pH	Obtained in field	NA	9.58	NA	9.51	NA	7.44	NA	7.38	NA	8.20	NA	9.30	NA	9.41	NA	7.54	NA	9.37	NA	9.37
Selenium	6020	0.0025	0.017	0.0025	0.014	0.013	0.016	0.0025	0.0080	0.0025	0.010	0.0025	0.0059	0.0025	ND	0.0025	0.017	0.0025	0.0079	0.0025	0.0079
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	100	580	100	570	100	540	130	690	100	500	100	370	100	410	100	540	100	280	100	280
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	1000	10	1300	10	1400	10	1500	10	1000	10	1000	10	750	10	1100	10	820	10	820
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 9.0 to 19.0 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

<sup>^</sup> - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

Sample: MW-06		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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	0.0018	0.0010	0.0018	0.0050	ND	0.0010	0.0031	0.0010	0.0022	0.0010	0.0022	0.0010	0.0021	0.0010	0.0026	0.0010	0.0020	0.0010	0.0020
Barium	6020	0.0025	0.050	0.0025	0.040	0.013	0.045	0.0025	0.041	0.0025	0.053	0.0025	0.044	0.0025	0.046	0.0025	0.054	0.0025	0.051	0.0025	0.051
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	0.25	2.7	0.25	2.5	0.050	2.4	0.050	3.0	0.050	2.5	0.25	2.5	0.50	2.9	0.25	3.0	0.50	3.0	0.50	3.0
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	120	10	210	10	150	10	120	10	120	10	110	10	92	10	110	10	110	10	110
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	0.85	0.10	0.88	0.10	0.79	0.10	0.97	0.10	0.77	0.10	0.68	0.10	0.81	0.10	ND	0.10	0.71	0.10	0.71 ^
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	0.073	0.0025	0.051	0.013	0.047	0.0025	0.024	0.0025	0.038	0.0025	0.029	0.0025	0.033	0.0025	0.038	0.0025	0.034	0.0025	0.034
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	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	0.0022
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	ND	0.10	0.26	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	ND	0.10	0.10	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND^	0.10	ND^	0.10	ND^
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	0.048	0.020	0.16	0.020	ND	0.020	ND	0.020	ND	0.020	0.052	0.020	0.026	0.020	ND	0.020	ND
pH	Obtained in field	NA	8.89	NA	9.65	NA	9.27	NA	9.44	NA	8.82	NA	9.39	NA	9.07	NA	9.17	NA	9.18	NA	9.18
Selenium	6020	0.0025	0.0062	0.0025	0.0028	0.013	ND	0.0025	0.011	0.0025	ND	0.0025	ND	0.0025	0.0034	0.0025	0.014	0.0025	0.0057	0.0025	0.0057
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	100	500	100	540	100	570	100	420	100	440	100	380	100	450	100	550	100	360	100	360
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	990	10	1100	10	1200	10	870	10	880	10	900	10	770	10	890	10	820	10	820
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, Will County Station, Romeoville, IL

Sample: MW-07		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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 <sup>^</sup>	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	0.0040	0.0010	0.0037	0.0050	ND	0.0010	0.0042	0.0010	0.0042	0.0010	0.0041	0.0010	0.0039	0.0010	0.0049	0.0010	0.0034		
Barium	6020	0.0025	0.045	0.0025	0.067	0.013	0.076	0.0025	0.082	0.0025	0.082	0.0025	0.069	0.0025	0.057	0.0025	0.086	0.0025	0.044		
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	0.25	4.7	1.0	5.0	1.0	5.7	0.25	3.4	0.050	5.0	0.25	5.1	0.50	5.6	0.25	5.5	0.50	5.1		
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	140	10	140	10	160	10	150	10	130	10	120	10	150	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	0.016	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	ND	0.010	0.017
Fluoride	SM 4500 F C	0.10	0.96	0.10	0.77	0.10	0.71	0.10	0.82	0.10	0.86	0.10	0.76	0.10	0.83	0.10	ND	0.10	0.89 <sup>^</sup>		
Iron	6020	0.10	0.23	0.10	0.18	0.50	ND	0.10	0.37	0.10	0.50	0.10	0.57	0.10	0.60	0.10	0.51	0.10	0.62		
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	0.11	0.013	0.15	0.0025	0.18	0.0025	0.20	0.0025	0.20	0.0025	0.19	0.0025	0.19	0.0025	0.19	0.0025	0.19
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	0.0029	0.0020	0.0023	0.010	ND	0.0020	0.0024	0.0020	0.0021	0.0020	ND	0.0020	0.0020	0.0020	ND	0.0020	ND	0.0020	ND
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND <sup>^</sup>	0.10	ND <sup>^</sup>		
Nitrogen/Nitrite	SM 4500 NO2 B	0.020	ND	0.020	0.077	0.020	0.035	0.020	0.050	0.020	0.043	0.020	ND	0.020	ND	0.020	ND	0.020	ND	0.020	ND
pH	Obtained in field	NA	8.61	NA	8.79	NA	8.13	NA	7.91	NA	7.69	NA	8.16	NA	7.92	NA	8.02	NA	7.75		
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	100	610	250	650	200	1000	100	710	130	710	100	770	100	670	100	600	100	480		
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	1300	10	1500	10	1600	10	1400	10	1300	10	1400	10	1300	10	1200	10	1200		
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

<sup>^</sup> - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

Sample: MW-08		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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	0.0067	0.0010	0.0059	0.0050	0.0082	0.0010	0.014	0.0010	0.012	0.0010	0.0066	0.0010	0.013	0.0010	0.018	0.0010	0.0088	0.0010	0.0088
Barium	6020	0.0025	0.069	0.0025	0.089	0.013	0.085	0.0025	0.099	0.0025	0.078	0.0025	0.066	0.0025	0.074	0.0025	0.090	0.0025	0.079	0.0025	0.079
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	0.25	1.7	0.25	1.3	0.050	1.7	0.050	2.3	0.050	1.9	0.25	1.5	0.50	2.0	0.25	2.6	0.50	2.1	0.50	2.1
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	93	10	270	10	200	10	160	10	130	10	160	10	160	10	150	10	150	10	150
Chromium	6020	0.0050	ND	0.0050	ND	0.025	ND	0.0050	ND	0.0050	ND	0.010	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	0.0020	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	0.61	0.10	0.55	0.10	0.57	0.10	0.64	0.10	0.61	0.10	0.52	0.10	0.60	0.10	0.65	0.10	0.58 ^	0.10	0.58 ^
Iron	6020	0.10	0.48	0.10	0.38	0.50	0.76	0.10	0.46	0.10	0.68	0.20	ND	0.10	0.58	0.10	0.66	0.10	0.50	0.10	0.50
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	0.44	0.013	0.47	0.0025	0.45	0.0025	0.40	0.0050	ND	0.0025	0.36	0.0025	0.41	0.0025	0.43	0.0025	0.43
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	0.0034	0.0020	0.0020	0.0040	ND	0.0020	0.0022	0.0020	0.0035	0.0020	0.0033	0.0020	0.0033
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	0.22	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	0.23
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	0.22	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND^	0.10	0.23	0.10	0.23
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	8.17	NA	7.47	NA	7.30	NA	6.99	NA	7.61	NA	7.36	NA	7.31	NA	7.43	NA	7.43
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	100	440	100	440	100	420	100	600	100	330	50	330	100	370	100	630	100	380	100	380
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	1200	10	1100	10	1300	10	980	10	910	10	1000	10	1200	10	1200	10	1200
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 9.0 to 19.0 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, Will County Station, Romeoville, IL

Sample: MW-09		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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 <sup>^</sup>	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	0.0059	0.0010	0.0049	0.0050	0.0052	0.0010	0.0065	0.0010	0.0078	0.0010	0.0053	0.0010	0.0056	0.0010	0.0068	0.0010	0.0060	0.0010	0.0060
Barium	6020	0.0025	0.025	0.0025	0.031	0.013	0.025	0.0025	0.023	0.0025	0.017	0.0025	0.023	0.0025	0.022	0.0025	0.026	0.0025	0.020	0.0025	0.020
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	0.25	2.2	0.25	1.4	0.050	1.7	0.050	2.0	0.050	1.9	0.25	1.4	1.0	1.8	0.25	2.0	0.50	1.7	0.50	1.7
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	100	10	280	10	230	10	190	10	140	10	200	10	160	10	160	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	0.018	0.010	ND	0.010	ND	0.010	ND
Fluoride	SM 4500 F C	0.10	0.33	0.10	0.36	0.10	0.28	0.10	0.28	0.10	0.38	0.10	0.39	0.10	0.32	0.10	0.41	0.10	0.42 <sup>^</sup>	0.10	0.42 <sup>^</sup>
Iron	6020	0.10	ND	0.10	ND	0.50	ND	0.10	ND	0.10	ND <sup>^</sup>	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	ND	0.0025	ND	0.013	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	ND	0.0025	0.0036	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	0.0022	0.00020	0.0023
Nickel	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	0.0022	0.0020	0.0023
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.20	2.4	0.10	1.1	0.10	ND	0.10	1.9	0.10	3.2	0.10	ND	0.10	ND	0.10	ND	0.10	4.1
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 F	0.10	ND	0.10	3.6	0.10	0.94	0.10	0.18	0.10	2.0	0.50	3.3	0.10	ND	0.10	ND <sup>^</sup>	0.10	ND	0.10	4.6
Nitrogen/Nitrite	SM 4500 NO2 B	0.10	0.44	0.20	1.2	0.020	0.16	0.040	0.22	0.020	0.15	0.020	0.12	0.020	0.027	0.020	0.023	0.10	0.55	0.10	0.55
pH	Obtained in field	NA	10.88	NA	10.87	NA	10.44	NA	10.27	NA	9.55	NA	10.56	NA	10.31	NA	10.23	NA	10.42	NA	10.42
Selenium	6020	0.0025	0.0036	0.0025	0.0042	0.013	ND	0.0025	0.0045	0.0025	0.0031	0.0025	ND	0.0025	0.0026	0.0025	0.0031	0.0025	0.0039	0.0025	0.0039
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	100	410	100	320	100	410	50	400	50	270	50	340	100	340	100	380	50	310	50	310
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	800	10	1000	10	940	10	850	10	660	10	820	10	880	10	800	10	800	10	780
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 9.0 to 19.0 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

<sup>^</sup> - Denotes instrument related QC exceeds the control limits

Table 1. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

Sample: MW-10		Date		12/13/2010		3/28/2011		6/15/2011		9/15/2011		12/8/2011		3/16/2012		6/20/2012		9/24/2012		12/18/2012	
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	0.0041	0.0010	0.0046	0.0050	ND	0.0010	0.0088	0.0010	0.0083	0.0010	0.0056	0.0010	0.0058	0.0010	0.0098	0.0010	0.0085	0.0010	0.0085
Barium	6020	0.0025	0.0098	0.0025	0.0091	0.013	0.091	0.0025	0.11	0.0025	0.11	0.0025	0.10	0.0025	0.10	0.0025	0.097	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	0.25	2.1	0.25	1.8	0.050	2.2	0.050	2.8	0.050	2.5	0.25	2.1	0.50	2.1	0.25	3.2	0.50	2.7	0.50	2.7
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	92	10	130	10	150	10	120	10	120	10	100	10	120	10	140	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	0.070	0.010	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	0.66	0.10	0.64	0.10	0.65	0.10	0.67	0.10	0.59	0.10	0.52	0.10	0.58	0.10	0.72	0.10	0.59 ^	0.10	0.59 ^
Iron	6020	0.10	0.32	0.10	0.46	0.50	0.63	0.10	0.60	0.10	0.71	0.10	0.61	0.10	0.58	0.10	0.77	0.10	0.91	0.10	0.91
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	0.00050
Manganese	6020	0.0025	0.25	0.0025	0.22	0.013	0.25	0.0025	0.27	0.0025	0.29	0.0025	0.25	0.0025	0.26	0.0025	0.23	0.0025	0.29	0.0025	0.29
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	ND	0.0020	ND	0.0020	ND	0.0020	ND	0.0020	0.0022	0.0020	0.0023	0.0020	0.0023
Nitrogen/Nitrate	Nitrogen Calc	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND
Nitrogen/Nitrate, Nitrite	SM 4500 NO3 P	0.10	ND^	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND	0.10	ND^	0.10	ND^	0.10	ND^
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	7.61	NA	8.14	NA	7.53	NA	7.45	NA	7.10	NA	7.59	NA	7.39	NA	7.60	NA	7.47	NA	7.47
Selenium	6020	0.0025	ND	0.0025	ND	0.013	ND	0.0025	0.0032	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	100	370	100	370	100	350	100	420	100	290	50	330	100	350	100	380	100	270	100	270
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	990	10	960	10	990	10	1000	10	1100	10	990	10	1000	10	970	10	1100	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 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

^ - Denotes instrument related QC exceeds the control limits

Table 2. Groundwater Analytical Results - Midwest Generation LLC, Will County Station, Romeoville, IL

12/18/2012		Sample		MW-01		MW-02		MW-03		MW-04		MW-05		MW-06		MW-07		MW-08		MW-09		MW-10	
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	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	0.0005	ND
Ethylbenzene	8260B	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	0.0005	ND
Toluene	8260B	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	0.0005	ND
Xylenes, Total	8260B	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND	0.001	ND
Perchlorate	314.0	0.004	ND	0.004	ND	0.004	ND	0.02	ND	0.004	ND	0.004	ND	0.004	ND	0.004	ND	0.004	ND	0.004	ND	0.004	ND
Vanadium, Dissolved	6020	0.0050	ND	0.0050	ND	0.0050	ND	0.010	ND	0.0050	0.034	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	ND	0.0050	0.031	0.0050	ND

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

October 4, 2012

CERTIFIED MAIL # 7010 2780 0002 1163 4864  
RETURN RECEIPT REQUESTED

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

**Re: Proposed Compliance Commitment Agreement  
Violation Notice: W-2012-00058  
Midwest Generation, LLC, Will County Generating Station; ID Number: 6283**

Dear Mr. Kennedy:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed the proposed Compliance Commitment Agreement ("CCA") terms submitted by Midwest Generation, LLC, Will County Generating Station in a letter dated September 4, 2012 and a supplemental e-mail received September 27, 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.

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, Will County 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.

RECEIVED

OCT 09 2012

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)693-5482  
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200  
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312)814-6026

PLEASE PRINT ON RECYCLED PAPER

MWG13-15\_660

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: W1978100011 CASE ID: 2012-006



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF: )

MIDWEST GENERATION, LLC, )  
WILL COUNTY GENERATING STATION) )  
ROMEOVILLE, WILL COUNTY, IL )  
ID NUMBER: 6283 )

) ILLINOIS EPA VN W-2012-00058  
) BUREAU OF WATER  
)

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**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, Will County 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 Will County Generating Station in Romeoville, Will County, Illinois ("Will County Station").
3. Pursuant to Violation Notice ("VN") W-2012-00058 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-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, and MW-10.  
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 September 4, 2012, and September 27, 2012, the Illinois EPA received Respondent's response and supplemental e-mail response to VN W-2012-00058, 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-2012-00058:
  - a) The ash ponds at Will County Station 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 ten groundwater monitoring wells for constituents in 35 Ill. Adm. Code 620.410(a) and (d), 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) Ponds 1 North (1N) and 1 South (1S) shall be removed from service at Will County Station. All process water shall be diverted from ponds 1N and 1S to existing ponds 2 South (2S) and 3 South (3S). A dewatering system shall be developed and implemented which will not allow water to exceed a depth of one foot above the bottom of Ponds 1N and 1S.
  - f) Within 90 days of the effective date of the CCA, Midwest Generation shall submit an application for a construction permit to re-line pond 2S at Will County Station with a 60 mil thickness high density polyethylene ("HDPE") liner or an Illinois EPA approved equivalent material.

- g) 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.
- h) Midwest Generation shall enter into an Environmental Land Use Control (ELUC) to cover the area of the Will County Station property which is contained within the GMZ, except for that portion of the GMZ area which is owned by ComEd. Midwest Generation shall submit a proposed draft ELUC to the Illinois EPA for review and comment within 90 days of the effective date of the CCA.
- i) Midwest Generation shall establish a GMZ pursuant to 35 Ill. Adm. Code Part 620.250 and submit a final proposed ELUC, incorporating the completed delineation of the GMZ boundaries, within one year of the effective date of the CCA.
- j) Once ponds 1N and 1S have been taken out of service, a dewatering system has been implemented, pond 2S has been relined with a HDPE liner, and a GMZ and ELUC have 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-2012-00058.
- 7. This CCA is solely intended to address the violations alleged in Illinois EPA VN W-2012-00058. 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 Will County Station in Romeoville, 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.

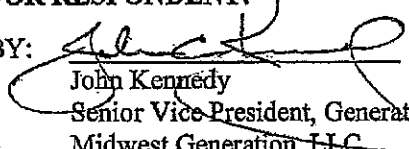
**AGREED:**

**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))*

