

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD, HOMEWOOD)	
ILLINOIS, VILLAGE OF ORLAND PARK,)	
ORLAND PARK ILLINOIS, VILLAGE OF)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,)	
VILLAGE OF TINLEY PARK, TINLEY PARK)	
ILLINOIS, EXXONMOBIL OIL CORPORATION,)	
VILLAGE OF WILMETTE, WILMETTE)	
ILLINOIS, CITY OF COUNTRY CLUB HILLS,)	
COUNTRY CLUB HILLS ILLINOIS, NORAMCO-)	
CHICAGO, INC., FLINT HILLS RESOURCES)	
JOLIET LLC, CITY OF EVANSTON, EVANSTON)	PCB 16-14 (Homewood)
ILLINOIS, VILLAGE OF SKOKIE, SKOKIE)	PCB 16-15 (Orland Park)
ILLINOIS, ILLINOIS DEPARTMENT OF)	PCB 16-16 (Midlothian)
TRANSPORTATION, METROPOLITAN WATER)	PCB 16-17 (Tinley Park)
RECLAMATION DISTRICT OF GREATER)	PCB 16-18 (ExxonMobil)
CHICAGO, VILLAGE OF RICHTON PARK,)	PCB 16-20 (Wilmette)
RICHTON PARK ILLINOIS, VILLAGE OF)	PCB 16-21 (Country Club Hills)
LINCOLNWOOD, LINCOLNWOOD ILLINOIS,)	PCB 16-22 (Noramco-Chicago)
CITY OF OAK FOREST, OAK FOREST)	PCB 16-23 (Flint Hills
ILLINOIS, VILLAGE OF LYNWOOD,)	Resources)
LYNWOOD ILLINOIS, CITGO HOLDINGS, INC.,)	PCB 16-25 (Evanston)
VILLAGE OF NEW LENOX, NEW LENOX,)	PCB 16-26 (Skokie)
ILLINOIS, CITY OF LOCKPORT, LOCKPORT)	PCB 16-27 (IDOT)
ILLINOIS, CATERPILLAR, INC., CITY OF)	PCB 16-29 (MWRDGC)
CREST HILL, CREST HILL ILLINOIS, CITY OF)	PCB 16-30 (Richton Park)
JOLIET, JOLIET ILLINOIS, MORTON SALT,)	PCB 16-31 (Lincolnwood)
INC., CITY OF PALOS HEIGHTS, PALOS)	PCB 16-33 (Oak Forest)
HEIGHTS ILLINOIS, VILLAGE OF)	PCB 19-7 (Village of Lynwood)
ROMEOVILLE, ROMEOVILLE ILLINOIS,)	PCB 19-8 (Citgo Holdings)
IMTT ILLINOIS LLC, STEPAN CO.,)	PCB 19-9 (New Lenox)
VILLAGE OF PARK FOREST, PARK FOREST)	PCB 19-10 (Lockport)
ILLINOIS, OZINGA READY MIX CONCRETE,)	PCB 19-11 (Caterpillar)
INC., OZINGA MATERIALS, INC., MIDWEST)	PCB 19-12 (Crest Hill)
MARINE TERMINALS LLC. VILLAGE OF)	PCB 19-13 (Joliet)
MOKENA, MOKENA ILLINOIS, VILLAGE OF)	PCB 19-14 (Morton Salt)
OAK LAWN, OAK LAWN ILLINOIS, VILLAGE)	PCB 19-15 (Palos Heights)
OF DOLTON, DOLTON ILLINOIS, VILLAGE OF)	PCB 19-16 (Romeoville)
GLENWOOD, GLENWOOD ILLINOIS,)	PCB 19-17 (IMTT Illinois)
VILLAGE OF MORTON GROVE, MORTON)	PCB 19-18 (Stepan)
GROVE ILLINOIS, VILLAGE OF LANSING,)	PCB 19-19 (Park Forest)
LANSING ILLINOIS, VILLAGE OF)	PCB 19-20 (Ozinga Ready Mix)
FRANKFORT, FRANKFORT ILLINOIS,)	PCB 19-21 (Ozinga Materials)
VILLAGE OF WINNETKA, WINNETKA)	PCB 19-22 (Midwest Marine)
ILLINOIS, VILLAGE OF LA GRANGE, LA)	PCB 19-23 (Mokena)
GRANGE ILLINOIS, INOREDION, INC.,)	PCB 19-24 (Oak Lawn)
VILLAGE OF CHANNAHON, CHANNAHON)	PCB 19-25 (Dolton)
ILLINOIS, COOK COUNTY DEPARTMENT)	PCB 19-26 (Glenwood)
OF TRANSPORTATION AND HIGHWAYS,)	PCB 19-27 (Morton Grove)
VILLAGE OF NILES, NILES ILLINOIS,)	PCB 19-28 (Lansing)

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2. To make efforts to include other dischargers in the TLWQS.
3. To conduct outreach and training for nonpoint sources.
4. To identify and describe any financial, technical or other assistance that the group may be able to provide to individual dischargers.
5. To prepare outreach and educational materials to create awareness about the environmental impacts of chlorides.
6. To coordinate with IEPA to identify MS4 communities, to reach out to those communities with information about the group's efforts, and to provide them with educational materials.
7. To coordinate with IEPA to identify nonpoint source categories, and to prioritize and implement education outreach efforts for nonpoint sources.

MWRD does not contest that these activities might be helpful in obtaining reductions in chloride discharges from other parties who are not among the Petitioners. And the work group members may decide that the work group will conduct and/or fund some of these activities. But we have not located any provision of State or Federal law that provides authority for the Board to require that Petitioners take these actions. Even U.S. EPA, which filed comments supporting some of these requirements, identified no legal basis. The only support that U.S. EPA provided was a citation to a U.S. EPA document – a response to comments on the Federal variance regulations – that states that if point and nonpoint sources collaborate, the variance (or, in Illinois, the TLWQS) “could be particularly successful.” That vague statement provides no legal basis to require Petitioners to take these actions. These provisions should be struck from the conditions that Petitioners are required to meet in the final Board order approving the TLWQS.

In their testimony, Openlands raised a different issue, claiming that the TLWQS could have an adverse impact on certain aquatic species. This claim is both factually incorrect and legally irrelevant. The Petitioners will be required to take actions to decrease their chloride discharges, so the conditions of the TLWQS will reduce any current impacts to those species. Moreover, the alleged effects to certain species that Openlands cites have never been raised to the Board in a rulemaking to develop water quality standards, so are not even proper to consider here. This is especially the case in this TLWQS proceeding, where Petitioners have shown (and no other party has disputed) that the current chlorides standards cannot currently be attained. Even if the alleged species effects raised by Openlands had been properly raised in a water quality standards proceeding (which has not happened), the effect would only be to make the standards even more difficult to attain, increasing the need for the TLWQS that Petitioners are requesting here.

Nevertheless, MWRD is willing to commit to certain actions to address the Openlands concerns. In its testimony at the hearing, Openlands indicated that its primary goal was to have MWRD commit to increased monitoring of chloride levels, beyond the monitoring at two locations that was proposed in the Joint Petition. MWRD does currently conduct monitoring of chloride levels at other locations. This sampling is conducted on a monthly basis unless weather, mechanical issues, or safety issues prevent sampling. On occasion, a sampling location may need to be moved to a new location, due to construction of a bridge or some other logistical issue, and sampling may need to be reduced temporarily due to extreme financial concerns. MWRD will commit to continuing those monthly tests, and is willing to have the Board include that requirement in its final Order approving the TLWQS, as long as flexibility is provided for those situations (outlined in this paragraph) in which the sampling regimen may need to be

modified. MWRD believes that this commitment is more than adequate to provide the information that Openlands is requesting concerning chloride levels in various reaches of the CAWS.

MWRD wants to emphasize, here, that while this additional monthly monitoring information could be helpful in assessing trends, it would not be helpful, and should not be used, in assessing compliance, for a plethora of reasons. As was stated in the Joint Petition, the chloride standards compliance issue is an issue that presents itself across the entire watershed, resulting from chloride loadings contributed by many sources dispersed throughout the area. The contributions from these sources, such as from road salt, occur episodically, due principally to wet-weather events and snow melt, and cannot be readily predicted. Levels of chlorides in various reaches will vary widely throughout the winter season. Moreover, there is simply no way to determine a particular chloride level that can be attained in a particular reach at a particular time – that is why this TLWQS is based on implementation of BMPs, and sources will be assessed relative to compliance with the BMPs that are required for their source categories. The only effective way in this situation to measure overall progress toward standards attainment is the way proposed in the Joint Petition: to look at long-term trends at two monitoring stations at the bottom of the watershed, where the cumulative impacts of Petitioners' BMP efforts can be assessed. That information, assessed at the end of each five-year term of the TLWQs, will help determine what has been achieved, and what goals can be set for the next five-year term.

In its comments submitted after the hearing, U.S. EPA proposes several changes to the conditions that would be imposed on the Petitioners in the TLWQS. Most of those changes are intended to modify the requirements that apply to dischargers, to go beyond the achievable BMPs that the Petitioners committed to in the Joint Petition. That change is not appropriate.

The Petitioners have committed to implement the BMPs identified in the Joint Petition. And, MWRD does not object to U.S. EPA's suggestion that if the group's annual reports identify additional BMPs as achievable, they should be required to implement those BMPs as well. But U.S. EPA goes beyond that, by proposing that the Board's language be changed (in several places) to require that dischargers take actions to reduce chlorides to the "greatest extent achievable including" the BMPs in the Petition and those identified later in the group's annual reports as being achievable (emphasis added). By adding in the general test of "greatest extent achievable" and then adding the word "including," U.S. EPA appears to be implying that a discharger could be compelled to adopt some other BMP – beyond those in the Joint Petition and the work group's annual reports – if it is "achievable." But it is not clear who would make that determination, how it would be made, or how "achievable" would be defined in this context for the individual discharger. The Petitioners have done the hard work of identifying the BMPs that are achievable for each of the relevant source categories. And they would implement any additional BMPs that the work group later identifies as being achievable for those categories. To implement these concepts, we suggest that the relevant language (in Sections 1(e), 2(a) and 3(a) of the Board's conditions be revised as specified in Attachment A to this brief. There is no basis to go beyond those requirements, to import an undefined individual-discharger BMP review into this watershed-level TLWQS. To impose individual conditions on each Petitioner would obviate the purpose of having one Joint Petition rather than 60 or more individual Petitions, and that course of action should be rejected by the Board.

U.S. EPA's comments also raise some specific issues regarding implementation of the PMP requirement, recommending that the Board "identify how the PMPs will be made available to the public and how implementation of the PMP will be enforced before the discharger's

permit has been obtained.” MWRD believes that both of those issues can be addressed readily. As to public availability, we recommend that the Board language clearly state that once the PMP is developed, it must be made available to the public, and that that can be done through inclusion of the PMP on the web site of the work group. That can be done through adding the following language at the end of Section 3(a): “Dischargers must make their Pollutant Minimization Plans publicly available (which may be done through inclusion of the plans on the workgroup’s web site.”

MWRD does not believe that it would be proper to require that the PMP be subjected to public comment, for several reasons. First, just from a timing standpoint, such an individual review would not fit into the permitting process. When a permit is issued or modified that contains the TLWQS, it will require the discharger to prepare the PMP. At that point, there is no PMP to comment on. Even more importantly, the PMP is simply a site-specific plan that describes how the detailed BMP requirements in the TLWQS will be implemented for that particular site. The BMPs have already been subjected to extensive opportunities for public comment, through the TLWQS process. To then require each individual PMP to go through public comment would be duplicative, and would destroy much of the benefit to developing this TLWQS on a watershed-wide level for each source category. If each BMP for each site could be revisited in an individual proceeding, then there was no point to submitting the Joint Petition for the entire watershed, on behalf of more than 60 sources throughout the area. The PMPs should be publicly available, and if someone believes that a PMP does not comply with the requirements of the TLWQS, they are free to bring that to the attention of IEPA, which can take appropriate enforcement action.

As to U.S. EPA's question concerning how and when dischargers will be required to develop their PMPs, MWRD believes that the simplest procedure would be for IEPA, once the TLWQS has been approved, to reopen all of the Petitioners' permits for the limited purpose of adding the chloride standard and the TLWQS conditions. Implementation of those conditions would then proceed, based on the schedule set forth in the TLWQS. We do not believe that there is another procedure available under State law that would make the TLWQS conditions enforceable for the Petitioners in advance of the inclusion of those conditions in their permits.

Dated: April 20, 2020

Respectfully submitted,

Metropolitan Water Reclamation District of Greater
Chicago

/s/ Fredric P. Andes

One of its Attorneys

Fredric P. Andes
BARNES & THORNBURG LLP
One North Wacker Drive
Suite 4400
Chicago, IL 60606-2833
P: (312) 214-8310
F: (312) 759-5646
Fredric.Andes@btlaw.com

ATTACHMENT A

SUGGESTED REVISIONS TO BMP PROVISIONS IN BOARD'S PROPOSED TLWQS CONDITIONS

1.e.

The discharger is committed to implementing a pollutant minimization program which includes all of the Best Management Practices (BMPs) identified by the Board's order granting the TLWQS. If other BMPs are subsequently identified by the workgroup as achievable for that source category in the workgroup's annual reports, the program will be modified to include those BMPs.

2.a.

The dischargers covered by this TLWQS must implement the Best Management Practices identified in Table 3 according to the implementation schedule in Table 4. If other BMPs are subsequently identified by the workgroup as achievable for that source category in the workgroup's annual reports, the dischargers must implement those BMPs, in accordance with an appropriate schedule that is identified in those annual reports.

3.a.

By the deadline listed in Table 4, dischargers must each prepare a Pollutant Minimization Program for their own operations that identifies the specific BMPs in Table 3 that it will implement along with the applicable monitoring, recordkeeping and reporting procedures, and the relevant schedule for implementation as provided in Table 4. If other BMPs are subsequently identified by the workgroup as achievable for that source category in the workgroup's annual reports, the program will be modified to include those BMPs, along with applicable monitoring, recordkeeping and reporting procedures and the appropriate schedule as identified in the workgroup's annual reports.

CERTIFICATE OF SERVICE

The undersigned attorney certified, under the penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing **POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO** to be served via electronic mail (from Fredric.Andes@btlaw.com) the 20th day of April, 2020 to the individuals listed on the attached service list.

/s/ Fredric P. Andes

Fredric P. Andes

SERVICE LIST

<p>Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, IL 60601</p>	<p>Don Brown, Clerk of the Board Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, IL 60601</p>
<p>PCB 2016-014 Stefanie N. Diers Sara Terranova Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p>	<p>PCB 2016-014 Christopher J. Cummings Christopher J. Cummings, P.C. 2014 Hickory Road Suite 205 Homewood, IL 60430</p>
<p>PCB 2016-014 Albert Ettinger Law Firm of Albert Ettinger 53 W. Jackson Suite 1664 Chicago, IL 60604</p>	<p>PCB 2016-015 Dennis Walsh E. Kenneth Friker Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477</p>
<p>PCB 2016-016 David J. Freeman Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd 631 E. Boughton Road Suite 200 Bolingbrook, IL 60440</p>	<p>PCB 2016-016 Peter Murphy 11800 S. 75th Avenue Suite 101 Palos Heights, IL 60463</p>
<p>PCB 2016-017 Dennis Walsh Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477</p>	<p>PCB 2016-018 Michael P. Murphy Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>PCB 2016-020 Dennis Walsh Erin K. Lavery Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477</p>	<p>PCB 2016-021 Amber M. Samuelson Peter D. Coblentz Rosenthal, Murphey, Coblentz & Donahue 30 N. LaSalle Street, Suite 1624 Chicago, IL 60602</p>

<p>PCB 2016-022 John P. Antonopoulos Antonopoulos & Virtel, PC 15419 127th Street Suite 100 Lemont, IL 60439</p>	<p>PCB 2016-023 Michael P. Murphy Alec Messina Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>PCB 2016-025 David Stoneback Lindsey Ott City of Evanston 555 Lincoln Street Evanston, IL 60201</p>	<p>PCB 2016-025 Alexandra B. Ruggie Hugh DuBose City of Evanston 2100 Ridge Road Evanston, IL 60201</p>
<p>PCB 2016-026 James G. McCarthy Michael M. Lorge Village of Skokie 5127 Oakton Street Skokie, IL 60077</p>	<p>PCB 2016-027 Matthew D. Dougherty Special Assistant Attorney General Illinois Dept. of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764</p>
<p>PCB 2016-029 Margaret T. Conway Metropolitan Water Reclamation District 100 E. Erie Street Chicago, IL 60611</p>	<p>PCB 2016-030 Amber M. Samuelson Peter D. Coblentz Rosenthal, Murphey, Coblentz & Donahue 30 N. LaSalle Street Suite 1624 Chicago, IL 60602</p>
<p>PCB 2016-031 Andrew N. Fiske Hart M. Passman Steven M. Elrod Holland & Knight LC 131 S. Dearborn Street 30th Floor Chicago, IL 60603</p>	<p>PCB 2016-033 Erin K. Lavery Scott F. Uhler Dennis G. Walsh Klein, Thorpe & Jenkins, Ltd. 20 N. Wacker Drive Suite 1660 Chicago, IL 60606</p>
<p>PCB 2019-7 Michael J. Marovich, Hiskes Dillner O Donnell Marovich Lapp Ltd 10759 W. 159th Street. Suite 201 Orland Park, IL 60467</p>	<p>PCB 2019-8 Jeffrey C. Fort Dentons US LLP 233 South Wacker Driver Suite 7800 Chicago, IL 60606-6404</p>

<p>PCB 2019-9 Michael R. Stiff Spesia and Taylor 1415 Black Road Joliet, IL 60435</p>	<p>PCB 2019-10 Sonni Choi Williams City of Lockport 222 East 9th Street Lockport , IL 60441</p>
<p>PCB 2019-11 Chuck Anthony Caterpillar Inc. 100 NE Adams St Peoria, IL 61629</p>	<p>PCB 2019-12 Michael R. Stiff Spesia and Taylor 1415 Black Road Joliet, IL 60435</p>
<p>PCB 2019-13 Martin J. Shanahan City of Joliet 150 West Jefferson Street Joliet, IL 60432</p>	<p>PCB 2019-14 Eric E. Boyd Tim Briscoe Thompson Coburn LLP 55 East Monroe Street Chicago, IL 60603</p>
<p>PCB 2019-15 Dennis G. Walsh Klein, Thorpe & Jenkins, Ltd. 20 N. Wacker Drive, Suite 1660 Chicago, IL 60606</p>	<p>PCB 2019-16 Dennis G. Walsh Klein, Thorpe & Jenkins, Ltd. 20 N. Wacker Drive, Suite 1660 Chicago, IL 60606</p>
<p>PCB 2019-17 David L. Rieser K & L Gates, LLP 70 W. Madison Street Ste. 3100 Chicago, IL 60602</p>	<p>PCB 2019-18 Peter Etienne Stepan Company 1135 Skokie Boulevard Northbrook, IL 60062</p>
<p>PCB 2019-19 Felicia L. Frazier Odelson & Sterk, Ltd. 3318 West 95th Street Evergreen Park, IL 60642</p>	<p>PCB 2019-20 Richard S. Porter Hinshaw & Culbertson LLC 100 Park Ave. PO Box 1389 Rockford, IL 61105</p>

<p>PCB 2019-21 Richard S. Porter Hinshaw & Culbertson LLC 100 Park Ave. PO Box 1389 Rockford, IL 61105</p>	<p>PCB 2019-22 Richard S. Porter Hinshaw & Culbertson LLC 100 Park Ave. PO Box 1389 Rockford, IL 61105</p>
<p>PCB 2019-23 Carl R. Buck Rathbun, Cservenyak & Kozol, LLC 3260 Executive Drive Joliet, IL 60431</p>	<p>PCB 2019-24 Thomas J. Condon, Jr. Peterson Johnson and Murray Chicago LLC 200 W. Adams Suite 2125 Chicago, IL 60606</p>
<p>PCB 2019-25 Amber M. Samuelson Rosenthal, Murphey, Coblenz & Donahue 30 North LaSalle St. Suite 1624 Chicago, Il 60602</p>	<p>PCB 2019-26 John F. Donahue Rosenthal, Murphey, Coblenz & Donahue 30 North LaSalle St. Suite 1624 Chicago, Il 60602</p>
<p>PCB 2019-27 Teresa Hoffman Liston Village of Morton Grove 6101 Capulina Avenue Morton Grove, IL 60053</p>	<p>PCB 2019-28 Matthew M. Welch Montana and Welch LLC 11950 South Harlem Avenue Suite 102 Palos Heights, IL 60463</p>
<p>PCB 2019-29 George F. Mahoney III Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, IL 60435</p>	<p>PCB 2019-30 Benjamin L. Schuster Holland & Knight LLC 150 North Riverside Plaza Suite 2700 Chicago, IL 60606</p>
<p>PCB 2019-31 Mark E. Burkland Holland & Knight LLC 150 North Riverside Plaza Suite 2700 Chicago, IL 60606</p>	<p>PCB 2019-32 Michael P. Murphy Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>

<p>PCB 2019-33 Marron Mahoney Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, IL 60435</p>	<p>PCB 2019-34 Jeffrey M. Fronczak Cook County Department of Transportation and Highways 69 W. Washington Street 24th Floor Chicago, IL 60602</p>
<p>PCB 2019-35 D. Danielle Grecic Village of Niles 1000 Civic Center Drive Niles, IL 60714</p>	<p>PCB 2019-36 Brett D. Heinrich Dana B. Mehlman Vedder Price 222 North LaSalle Street Suite 2600 Chicago, IL 60601</p>
<p>PCB 2019-37 David J. Silverman Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, IL 60435</p>	<p>PCB 2019-38 Jared Policicchio City Of Chicago Department of Law 30 N. LaSalle Street Suite 1400 Chicago, IL 60602</p>
<p>PCB 2019-40 David B. Sosin Sosin Arnold and Schoenbeck Ltd. 9501 W. 144th Place Suite 205 Orland Park, IL 60462</p>	<p>PCB 2019-48 Edward J. Bailey Village of Riverside 3860 Columbus Boulevard Riverside, IL 60546</p>
<p>PCB 2019-48 Dennis G. Walsh Klein, Thorpe & Jenkins, Ltd. 20 N. Wacker Drive, Suite 1660 Chicago, IL 60606</p>	