

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, PRAIRIE RIVERS)	
NETWORK, and NATIONAL)	
ASSOCIATION FOR THE)	
ADVANCEMENT OF COLORED PEOPLE,)	
)	
Complainants,)	
)	PCB 18-11
v.)	(Enforcement – Water)
)	
CITY WATER, LIGHT and POWER,)	
)	
Respondent.)	
)	

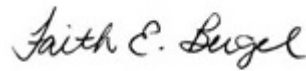
NOTICE OF FILING

To: Don Brown, Clerk
Illinois Pollution Control Board
100 West Randolph
Suite 11-500
Chicago, IL 60601

And Attached Service List

Please take note that on 24th day of June, 2019, I filed electronically with the Office of the Clerk of the Illinois Pollution Control Board the attached Complainants’ Notice of Errata, a copy of which is attached and served upon you.

Respectfully Submitted,



Faith E. Bugel
1004 Mohawk
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(312) 282-9119

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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)	
)	
SIERRA CLUB; PRAIRIE RIVERS)	
NETWORK; NATIONAL ASSOCIATION)	
FOR THE ADVANCEMENT OF)	
COLORED PEOPLE,)	
)	
Complainant(s),)	
)	
v.)	PCB 18-11
)	(Enforcement – Water)
)	
)	
CITY OF SPRINGFIELD, OFFICE OF)	
PUBLIC UTILITIES d/b/a CITY)	
WATER, LIGHT & POWER)	
)	
)	
)	
Respondent(s))	
)	

COMPLAINANTS' NOTICE OF ERRATA

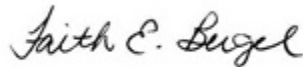
NOW COME the Complainants, Sierra Club, Prairie Rivers Network, and National Association for the Advancement of Colored People (“Complainants”), by and through counsel, and respectfully submit this Notice of Errata in the Amended Complaint. In conjunction with this notice, Complainants state as follows.

1. Complainants’ Amended Complaint, filed on April 19, 2019, contains two minor transcription errors. First, the value identified for AW-3 for iron for February 2017 is indicated in Complainant’s Amended Complaint in both Exhibit D, Violations of Illinois Class I groundwater standards at the CWLP Site, and Exhibit E, Violations of Illinois Class II groundwater standards at the CWLP Site, as 36.7 when the correct value is 35.7.

2. Second, four values (boron, iron, manganese and TDS) were erroneously entered into both Exhibit D, Violations of Illinois Class I groundwater standards at the CWLP Site, and Exhibit E, Violations of Illinois Class II groundwater standards at the CWLP Site, for AP-2 for November 2015 when no such values are available.

3. As a result of the second error Complainants' violation counts in paragraph 28 of the Complaint are too high. The last sentence of paragraph 28 should read "As shown in Exhibit D, even with sometimes inconsistent sampling, CWLP has identified ongoing violations of Illinois Class I Groundwater Quality Standards on 365 separate occasions or, as shown in Exhibit E, violations of Illinois Class II Groundwater Quality Standards on 237 separate occasions, since monitoring began in late 2010."

Respectfully Submitted,



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*Attorneys for Sierra Club, Prairie Rivers Network,
and National Association for the Advancement of
Colored People*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Electronic Filing and Notice of Errata were served to all parties of record listed below by electronic mail on the 24th of June, 2019.



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