

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

DOLTON ILLINOIS, VILLAGE OF)	PCB 19-31 (La Grange)
GLENWOOD, GLENWOOD ILLINOIS,)	PCB 19-33 (Channahon)
VILLAGE OF MORTON GROVE,)	PCB 19-34 (CCDTH)
MORTON GROVE ILLINOIS, VILLAGE)	PCB 19-35 (Niles)
OF LANSING, LANSING ILLINOIS,)	PCB 19-36 (Skyway)
VILLAGE OF FRANKFORT,)	PCB 19-37 (Elwood)
FRANKFORT ILLINOIS, VILLAGE OF)	PCB 19-38 (Chicago)
WINNETKA, WINNETKA ILLINOIS,)	PCB 19-40 (Crestwood)
VILLAGE OF LA GRANGE, LA GRANGE)	PCB 19-48 (Riverside)
ILLINOIS, VILLAGE OF CHANNAHON,)	(Time-Limited Water Quality
CHANNAHON ILLINOIS, COOK)	Standard)
COUNTY DEPARTMENT OF)	(Consolidated)
TRANSPORTATION AND HIGHWAYS,)	
VILLAGE OF NILES, NILES ILLINOIS,)	
SKYWAY CONCESSION COMPANY)	
LLC, VILLAGE OF ELWOOD, ELWOOD)	
ILLINOIS, CITY OF CHICAGO,)	
CHICAGO ILLINOIS, VILLAGE OF)	
CRESTWOOD, CRESTWOOD ILLINOIS)	
and VILLAGE OF RIVERSIDE,)	
RIVERSIDE ILLINOIS,)	
)	
Petitioners,)	
)	
v.)	
)	
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

PETITIONER VILLAGE OF FRANKFORT'S
ADOPTION OF MWRD'S POST HEARING BRIEF AS ITS OWN

Now comes Petitioner, Village of Frankfort ("Frankfort"), by and through its attorneys, Mahoney, Silverman & Cross, LLC, and in response to the February 27, 2020 Order entered by Hearing Officer Bradley P. Halloran, with the deadline thereafter extended by the March 26, 2020 Order, in which the parties were directed, if they so choose, to file post-hearing briefs by April 21, 2020, states as follows:

To the extent it is not inconsistent with its Petition, salient applicable facts, and appropriate and reasonable site specific PMPs, the Village of Frankfort adopts the Post Hearing Brief of Metropolitan Water Reclamation District of Greater Chicago as its Post Hearing Brief.

VILLAGE OF FRANKFORT

By: /s/ Marron A. Mahoney
 One of Its Attorneys

Marron Mahoney – 6293279
Mahoney, Silverman & Cross, LLC
822 Infantry Drive, Suite 100
Joliet, IL 60435
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ILLINOIS POLLUTION CONTROL BOARD

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VILLAGE OF NILES, NILES ILLINOIS,)	
SKYWAY CONCESSION COMPANY)	
LLC, VILLAGE OF ELWOOD, ELWOOD)	
ILLINOIS, CITY OF CHICAGO,)	
CHICAGO ILLINOIS, VILLAGE OF)	
CRESTWOOD, CRESTWOOD ILLINOIS)	
and VILLAGE OF RIVERSIDE,)	
RIVERSIDE ILLINOIS,)	
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Petitioners,)	
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v.)	
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ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on April 21, 2020, the VILLAGE OF FRANKFORT electronically filed with the Office of the Clerk of the Illinois Pollution Control Board **PETITIONER VILLAGE OF FRANKFORT’S ADOPTION OF MWRD’S POST HEARING BRIEF AS ITS OWN**, a copy of which is hereby served upon you.

Dated: April 21, 2020

VILLAGE OF FRANKFORT

By: /s/ Marron A. Mahoney
One of Its Attorneys

Marron A. Mahoney – 6293279

Mahoney, Silverman & Cross, LLC

822 Infantry Drive, Suite 100

Joliet, IL 60435

(815) 730-9500

mmahoney@msclawfirm.com

PROOF OF SERVICE

The undersigned attorney certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that she caused a copy of the foregoing **PETITIONER VILLAGE OF FRANKFORT'S ADOPTION OF MWRD'S POST HEARING BRIEF AS ITS OWN**, to be served via E-mail on the 21st day of April 2020 to:

See Attached Service List

VILLAGE OF FRANKFORT

By: /s/ Marron A. Mahoney
One of Its Attorneys

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>

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<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>

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<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>

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<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>
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<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>
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<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>

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<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>	<p>PCB 2016-29 Fredric P. Andes Barnes and Thornburg 1 N. Wacker Drive Suite 4400 Chicago, IL 60606</p>