

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

VILLAGE OF CHANNAHON, CHANNAHON	)	PCB 19-33 (Channahon)
ILLINOIS, COOK COUNTY DEPARTMENT OF	)	PCB 19-34 (CCDTH)
TRANSPORTATION AND HIGHWAYS,	)	PCB 19-35 (Niles)
VILLAGE OF NILES, NILES ILLINOIS, SKYWAY	)	PCB 19-36 (Skyway)
CONCENSSION COMPANY LLC, VILLAGE OF	)	PCB 19-37 (Elwood)
ELWOOD, ELWOOD ILLINOIS, CITY OF	)	PCB 19-38 (Chicago)
CHICAGO, CHICAGO ILLINOIS, VILLAGE OF	)	PCB 19-40 (Crestwood)
CRESTWOOD, CRESTWOOD ILLINOIS, and	)	PCB 19-48 (Riverside)
VILLAGE OF RIVERSIDE, RIVERSIDE	)	(Time-Limited Water Quality
ILLINOIS,	)	Standard)
	)	(Consolidated)
Petitioners,	)	
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
	)	
Respondent.	)	

**PETITIONER VILLAGE OF CHANNAHON'S POST-HEARING BRIEF**

Now comes Petitioner, Village of Channahon ("Channahon"), by and through its attorneys, Mahoney, Silverman & Cross, LLC, and for its Post-Hearing Brief in this matter, states as follows:

Channahon concurs with the Post-Hearing Brief for the Metropolitan Water Reclamation District of Greater Chicago ("MWRD") (PCB 16-29) and adopts the MWRD brief as its Post-Hearing Brief. Channahon further states that it incorporates and endorses those arguments and positions advanced by MWRD except where they do not apply to the individual circumstances of Channahon. In those circumstances, Channahon endorses in general principal the positions of MWRD.

**VILLAGE OF CHANNAHON**

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

Marron Mahoney - 6293279  
Mahoney, Silverman & Cross, LLC  
822 Infantry Drive, Suite 100  
Joliet, IL 60435  
(815) 730-9500  
[mmahoney@msclawfirm.com](mailto:mmahoney@msclawfirm.com)

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

ILLINOIS, VILLAGE OF LA GRANGE, LA	)	PCB 19-30 (Winnetka)
GRANGE ILLINOIS, INOREDION, INC.,	)	PCB 19-31 (La Grange)
VILLAGE OF CHANNAHON, CHANNAHON	)	PCB 19-33 (Channahon)
ILLINOIS, COOK COUNTY DEPARTMENT OF	)	PCB 19-34 (CCDTH)
TRANSPORTATION AND HIGHWAYS,	)	PCB 19-35 (Niles)
VILLAGE OF NILES, NILES ILLINOIS, SKYWAY	)	PCB 19-36 (Skyway)
CONCENSSION COMPANY LLC, VILLAGE OF	)	PCB 19-37 (Elwood)
ELWOOD, ELWOOD ILLINOIS, CITY OF	)	PCB 19-38 (Chicago)
CHICAGO, CHICAGO ILLINOIS, VILLAGE OF	)	PCB 19-40 (Crestwood)
CRESTWOOD, CRESTWOOD ILLINOIS, and	)	PCB 19-48 (Riverside)
VILLAGE OF RIVERSIDE, RIVERSIDE	)	(Time-Limited Water Quality
ILLINOIS,	)	Standard)
	)	(Consolidated)
Petitioners,	)	
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

To: See Attached Service List

**PLEASE TAKE NOTICE** that on April 21, 2020, the VILLAGE OF CHANNAHON electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its **Post-Hearing Brief**, a copy of which is hereby served upon you.

Dated: April 21, 2020

**VILLAGE OF CHANNAHON**

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

Marron Mahoney - 6293279  
**Mahoney, Silverman & Cross, LLC**  
822 Infantry Drive, Suite 100  
Joliet, IL 60435  
(815) 730-9500  
[mmahoney@msclawfirm.com](mailto: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 Channahon's Post-Hearing Brief** to be served via E-mail on the 21<sup>th</sup> day of April, 2020 to:

See Attached Service List

*/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 &amp; Jenkins                  15010 S. Ravinia Avenue                  Suite 17                  Orland Park, IL 60477</p>
<p>PCB 2016-016                  David J. Freeman                  Robbins, Schwartz, Nicholas, Lifton &amp; 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 &amp; 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 &amp; 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 &amp; Donahue                  30 N. LaSalle Street, Suite 1624                  Chicago, IL 60602</p>

Electronic Filing: Received, Clerk's Office 04/21/2020

<p>PCB 2016-022                  John P. Antonopoulos                  Antonopoulos &amp; 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 &amp; 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 &amp; Knight LC                  131 S. Dearborn Street                  30<sup>th</sup> Floor                  Chicago, IL 60603</p>	<p>PCB 2016-033                  Erin K. Lavery                  Scott F. Uhler                  Dennis G. Walsh                  Klein, Thorpe &amp; 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>

Electronic Filing: Received, Clerk's Office 04/21/2020

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



Electronic Filing: Received, Clerk's Office 04/21/2020

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

Electronic Filing: Received, Clerk's Office 04/21/2020

<p>PCB 2019-33 Marron Mahoney Mahoney, Silverman &amp; Cross, LLC 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 &amp; Cross, LLC 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 &amp; 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>