

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 (Flint Hills Resources)
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 19-11 (Caterpillar)
NEW LENOX, NEW LENOX ILLINOIS,)	PCB 19-12 (Crest Hill)
CITY OF LOCKPORT, LOCKPORT)	PCB 19-13 (Joliet)
ILLINOIS, CATERPILLAR, INC., CITY)	PCB 19-14 (Morton Salt)
OF CREST HILL, CREST HILL ILLINOIS,)	PCB 19-15 (Palos Heights)
CITY OF JOLIET, JOLIET ILLINOIS,)	PCB 19-16 (Romeoville)
MORTON SALT, INC., CITY OF PALOS)	PCB 19-17 (IMTT Illinois)
HEIGHTS, PALOS HEIGHTS ILLINOIS,)	PCB 19-18 (Stepan)
VILLAGE OF ROMEOVILLE,)	PCB 19-19 (Park Forest)
ROMEOVILLE ILLINOIS, IMTT)	PCB 19-20 (Ozinga Ready Mix)
ILLINOIS LLC, STEPAN CO., VILLAGE)	PCB 19-21 (Ozinga Materials)
OF PARK FOREST, PARK FOREST)	PCB 19-22 (Midwest Marine)
ILLINOIS, OZINGA READY MIX)	PCB 19-23 (Mokena)
CONCRETE, INC., OZINGA)	PCB 19-24 (Oak Lawn)
MATERIALS, INC., MIDWEST MARINE)	PCB 19-25 (Dolton)
TERMINALS LLC, VILLAGE OF)	PCB 19-26 (Glenwood)
MOKENA, MOKENA ILLINOIS,)	PCB 19-27 (Morton Grove)
VILLAGE OF OAK LAWN, OAK LAWN)	PCB 19-28 (Lansing)

ILLINOIS, VILLAGE OF DOLTON,)	PCB 19-29 (Frankfort)
DOLTON ILLINOIS, VILLAGE OF)	PCB 19-30 (Winnetka)
GLENWOOD, GLENWOOD ILLINOIS,)	PCB 19-31 (La Grange)
VILLAGE OF MORTON GROVE,)	PCB 19-32 (Ingredion)
MORTON GROVE ILLINOIS, VILLAGE)	PCB 19-33 (Channahon)
OF LANSING, LANSING ILLINOIS,)	PCB 19-34 (CCDTH)
VILLAGE OF FRANKFORT,)	PCB 19-35 (Niles)
FRANKFORT ILLINOIS, VILLAGE OF)	PCB 19-36 (Skyway)
WINNETKA, WINNETKA ILLINOIS,)	PCB 19-37 (Elwood)
VILLAGE OF LA GRANGE, LA GRANGE)	PCB 19-38 (Chicago)
ILLINOIS, INGREDION, INC., VILLAGE)	PCB 19-40 (Crestwood)
OF CHANNAHON, CHANNAHON)	PCB 19-48 (Riverside)
ILLINOIS, COOK COUNTY)	
DEPARTMENT OF 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 RICHTON PARK POST-HEARING BRIEF

NOW COMES Petitioner, Village of Richton Park, by and through its attorney, Odelson, Sterk, Murphey, Frazier & McGrath, Ltd., and pursuant to Orders entered herein by Hearing Officer Bradley P. Halloran in which the parties were permitted, if they so choose, to file post-hearing briefs in this matter, states as follows:

Village of Richton Park hereby concurs with and adopts as and for its own Post-Hearing Brief the Post-Hearing Brief of the Metropolitan Water Reclamation District of Greater Chicago

("MWRDGC")(PCB 16-29), as and for its Post-Hearing Brief. Village of Richton Park further states that the MWRDGC Post-Hearing Brief incorporates those arguments and positions Village of Richton Park endorses and advocates, except where they do not apply to the individual circumstances of Village of Richton Park. In such instances, Village of Richton Park endorses in general principal the positions of MWRDGC.

Respectfully submitted,

VILLAGE OF Richton Park

s/ Amber M. Samuelson
One of its Attorneys

Amber M. Samuelson
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ILLINOIS, CITY OF CHICAGO,)	
CHICAGO ILLINOIS, VILLAGE OF)	
CRESTWOOD, CRESTWOOD ILLINOIS)	
and VILLAGE OF RIVERSIDE,)	
RIVERSIDE ILLINOIS,)	
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NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on April 22, 2020, the undersigned caused to be filed with the Office of the Clerk of the Illinois Pollution Control Board PETITIONER VILLAGE OF RICHTON PARK'S POST-HEARING BRIEF, a copy of which is attached hereto.

s/ Amber M. Samuelson

Amber M. Samuelson
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CERTIFICATE OF SERVICE

I, Amber M. Samuelson, an attorney, hereby state and affirm that I caused a copy of the foregoing electronically filed document to be served upon parties on the attached service list via electronic mail on April 22, 2020.

s/ Amber M. Samuelson _____

SERVICE LIST

<p>Don Brown Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Ste. 11-500 Chicago, IL 60601</p>	<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>PCB 2016-14 Stefanie N. Diers Sara Terranova IEPA 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p>	<p>PCB 2016-14 Christopher J. Cummings Christopher J. Cummings, P.C. 2014 Hickory Road Suite 205 Homewood, IL 60430</p>
<p>PCB 2016-14 Albert Ettinger Law Firm of Albert Ettinger 53 W. Jackson Suite 1664 Chicago, IL 60604</p>	<p>PCB 2016-15 Dennis Walsh E. Kenneth Friker Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477</p>
<p>PCB 2016-16 David J. Freeman Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd. 631 E. Boughton Road 200 Bolingbrook, IL 60440</p>	<p>PCB 2016-16 Peter Murphy 11800 S. 75th Ave. Suite 101 Palos Heights, IL 60463</p>
<p>PCB 2016-17 Dennis Walsh Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477</p>	<p>PCB 2016-18 Michael P. Murphy Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>PCB 2016-20 Dennis Walsh Erin K. Lavery Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477</p>	<p>PCB 2016-21 Amber M. Samuelson Odelson, Sterk, Murphey, Frazier & McGrath, Ltd. 3318 W. 95th Street Evergreen Park, Illinois 60805</p>

<p>PCB 2016-22 John P. Antonopoulos Antonopoulos & Virtel, PC 15419 127th Street Suite 100 Lemont, IL 60439</p>	<p>PCB 2016-23 Michael P. Murphy Alec Messina Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>PCB 2016-25 David Stoneback Lindsey Ott City of Evanston 555 Lincoln St. Evanston, IL 60201</p>	<p>PCB 2016-25 Alexandra B. Ruggie Hugh DuBose City of Evanston 2100 Ridge Road Evanston, IL 60201</p>
<p>PCB 2016-26 James G. McCarthy Village of Skokie 5127 Oakton Street Skokie, IL 60077</p>	<p>PCB 2016-27 Matthew D. Dougherty Special Assistant Attorney General Illinois Dept. of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764</p>
<p>PCB 2016-29 Margaret T. Conway Metropolitan Water Reclamation District 100 E. Erie Street Chicago, IL 60611</p>	<p>PCB 2016-30 Amber M. Samuelson Odelson, Sterk, Murphey, Frazier & McGrath, Ltd. 3318 W. 95th Street Evergreen Park, Illinois 60805</p>
<p>PCB 2016-31 Andrew N. Fiske Hart M. Passman Steven M. Elrod Holland & Knight LLC 131 S. Dearborn Street 30th Floor Chicago, IL 60603</p>	<p>PCB 2016-33 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 St. Suite 201 Orland Park, IL 60467</p>	<p>PCB 2019-8 Jeffrey C. Fort Dentons US LLP 233 S. Wacker Dr. Suite 7800 Chicago, IL 60606</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 E. Monroe Street Chicago, IL 60603</p>
<p>PCB 2019-15 Dennis Walsh Klein, Thorpe & Jenkins 20 N. Wacker Dr. Suite 1660 Chicago, IL 60606</p>	<p>PCB 2019-16 Dennis Walsh Klein, Thorpe & Jenkins 20 N. Wacker Dr. Suite 1660 Chicago, IL 60606</p>
<p>PCB 2019-17 David L. Rieser K & L Gates, LLP 70 W. Madison Street Suite 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, Murphey, Frazier & McGrath, Ltd. 3318 West 95th Street Evergreen Park, IL 60805</p>	<p>PCB 2019-20 Richard S. Porter Hinshaw & Culbertson 100 Park Avenue P.O. Box 1389 Rockford, IL 61105</p>

<p>PCB 2019-21 Richard S. Porter Hinshaw & Culbertson 100 Park Avenue P.O. Box 1389 Rockford, IL 61105</p>	<p>PCB 2019-22 Richard S. Porter Hinshaw & Culbertson 100 Park Avenue P.O. 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 & Murray Chicago LLC 200 W. Adams Suite 2125 Chicago, IL 60606</p>
<p>PCB 2019-25 Amber M. Samuelson Odelson, Sterk, Murphey, Frazier & McGrath, Ltd. 3318 W. 95th Street Evergreen Park, Illinois 60805</p>	<p>PCB 2019-26 John F. Donahue Donahue & Rose, PC 9501 W. Devon Suite 702 Rosemont, IL 60018</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 S. 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 N. Riverside Plaza Suite 2700 Chicago, IL 60603</p>
<p>PCB 2019-31 Mark E. Burkland Holland & Knight LLC 150 N. Riverside Plaza Suite 2700 Chicago, IL 60603</p>	<p>PCB 2019-32 Michael P. Murphy Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>

<p>PCB 2019-33 Marron Mahoney III Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, IL 60435</p>	<p>PCB 2019-34 Jeffrey M. Fronczak Cook County Dept. of Transportation and Highways 69 W. Washington Street 24th Floor Chicago, IL 60602</p>
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<p>PCB 2019-37 David J. Silverman Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, L 60435</p>	<p>PCB 2019-38 Jared Policicchio 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 Blvd. Riverside, Il 60546</p>
<p>PCB 2019-48 Dennis Walsh Klein, Thorpe & Jenkins 20 N. Wacker Dr. Suite 1660 Chicago, IL 60606</p>	