

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 CITY OF COUNTRY CLUB HILLS POST-HEARING BRIEF**

NOW COMES Petitioner, City of Country Club Hills, 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:

City of Country Club Hills 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. City of Country Club Hills further states that the MWRDGC Post-Hearing Brief incorporates those arguments and positions City of Country Club Hills endorses and advocates, except where they do not apply to the individual circumstances of the City of Country Club Hills. In such instances, the City of Country Club Hills endorses in general principal the positions of MWRDGC.

Respectfully submitted,

CITY OF COUNTRY CLUB HILLS,

s/ Amber M. Samuelson  
One of its Attorneys

Amber M. Samuelson  
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ILLINOIS POLLUTION CONTROL BOARD

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HOMEWOOD ILLINOIS, VILLAGE OF	)	
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MOKENA, MOKENA ILLINOIS,	)	PCB 19-27 (Morton Grove)
VILLAGE OF OAK LAWN, OAK LAWN	)	PCB 19-28 (Lansing)

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WINNETKA, WINNETKA ILLINOIS,	)	PCB 19-37 (Elwood)
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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.	)	

**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 CITY OF COUNTRY CLUB HILL'S POST-HEARING BRIEF, a copy of which is attached hereto.

s/ Amber M. Samuelson

Amber M. Samuelson  
ODELSON, STERK, MURPHEY,  
FRAZIER & MCGRATH, LTD.  
3318 West 95th Street  
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asamuelson@osmf.com

**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 &amp; Jenkins                  15010 S. Ravinia Avenue                  Suite 17                  Orland Park, IL 60477</p>
<p>PCB 2016-16                  David J. Freeman                  Robbins, Schwartz, Nicholas,                  Lifton &amp; 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 &amp; 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 &amp; Jenkins                  15010 S. Ravinia Avenue                  Suite 17                  Orland Park, IL 60477</p>	<p>PCB 2016-21                  Amber M. Samuelson                  Odelson, Sterk, Murphey,                  Frazier &amp; McGrath, Ltd.                  3318 W. 95<sup>th</sup> Street                  Evergreen Park, Illinois 60805</p>

<p>PCB 2016-22                  John P. Antonopoulos                  Antonopoulos &amp; 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 &amp; McGrath, Ltd.                  3318 W. 95<sup>th</sup> Street                  Evergreen Park, Illinois 60805</p>
<p>PCB 2016-31                  Andrew N. Fiske                  Hart M. Passman                  Steven M. Elrod                  Holland &amp; 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 &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 &amp; 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 &amp; Jenkins  20 N. Wacker Dr.  Suite 1660  Chicago, IL 60606</p>	<p>PCB 2019-16  Dennis Walsh  Klein, Thorpe &amp; Jenkins  20 N. Wacker Dr.  Suite 1660  Chicago, IL 60606</p>
<p>PCB 2019-17  David L. Rieser  K &amp; 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 &amp; McGrath, Ltd.  3318 West 95th Street  Evergreen Park, IL 60805</p>	<p>PCB 2019-20  Richard S. Porter  Hinshaw &amp; Culbertson  100 Park Avenue  P.O. Box 1389  Rockford, IL 61105</p>

<p>PCB 2019-21                  Richard S. Porter                  Hinshaw &amp; Culbertson                  100 Park Avenue                  P.O. Box 1389                  Rockford, IL 61105</p>	<p>PCB 2019-22                  Richard S. Porter                  Hinshaw &amp; Culbertson                  100 Park Avenue                  P.O. Box 1389                  Rockford, IL 61105</p>
<p>PCB 2019-23                  Carl R. Buck                  Rathbun, Cservenyak &amp; Kozol, LLC                  3260 Executive Drive                  Joliet, IL 60431</p>	<p>PCB 2019-24                  Thomas J. Condon, Jr.                  Peterson Johnson &amp; Murray Chicago LLC                  200 W. Adams                  Suite 2125                  Chicago, IL 60606</p>
<p>PCB 2019-25                  Amber M. Samuelson                  Odelson, Sterk, Murphey,                  Frazier &amp; McGrath, Ltd.                  3318 W. 95<sup>th</sup> Street                  Evergreen Park, Illinois 60805</p>	<p>PCB 2019-26                  John F. Donahue                  Donahue &amp; Rose, PC                  9501 W. Devon Avenue                  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 &amp; Cross, Ltd.                  822 Infantry Drive                  Suite 100                  Joliet, IL 60435</p>	<p>PCB 2019-30                  Benjamin L. Schuster                  Holland &amp; Knight LLC                  150 N. Riverside Plaza                  Suite 2700                  Chicago, IL 60603</p>
<p>PCB 2019-31                  Mark E. Burkland                  Holland &amp; 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 &amp; 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>
<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 N. LaSalle Street Suite 2600 Chicago, IL 60601</p>
<p>PCB 2019-37 David J. Silverman Mahoney, Silverman &amp; 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 &amp; Jenkins 20 N. Wacker Dr. Suite 1660 Chicago, IL 60606</p>	