

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
 by KWAME RAOUL, Attorney General )  
 of the State of Illinois, )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 NORMA BONELLI-ZOOK, an individual, )  
 d/b/a FOUNTAIN VALLEY MOBILE )  
 HOME PARK, an unincorporated entity, )  
 )  
 Respondent. )

PCB No. 24-  
(Enforcement – Water (NPDES))

**NOTICE OF FILING**

TO: See attached service list

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint, Stipulation and Proposal for Settlement and Motion for Relief from Hearing Requirements, copies which are attached and hereby served upon you. **You may be required to answer the charges of the Complaint at a hearing before the Board, at a date set by the Board.**

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the clerk's office, or an attorney.

NOTIFICATION - YOU ARE HEREBY NOTIFIED that financing may be available through the Illinois Environmental Facilities Financing Act [20 ILCS 3515/1, et seq.] to correct the alleged violations.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
KWAME RAOUL, Attorney General  
of the State of Illinois

By: /s/Bridget I. Flynn  
 Bridget I. Flynn, #6332314  
 Assistant Attorney General  
 Environmental Bureau  
 Illinois Attorney General's Office  
 500 South Second Street  
 Springfield, Illinois 62706  
 Office: (217) 782-9033  
 Cell: (312) 848-5254  
*Briget.Flynn@ilag.gov*

Date: August 21, 2023

**Service List**

For the Respondent

Norma Bonelli-Zook  
d/b/a Fountain Valley Mobile Home Park  
1 Fountain Valley Road  
Rantoul, IL 61866  
valleyrantoul@aol.com  
*(via certified mail)*

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**COMPLAINT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, complains of Respondent, NORMA BONELLI-ZOOK, an individual, d/b/a FOUNTAIN VALLEY MOBILE HOME PARK, an unincorporated entity, as follows:

**COUNT I**  
**FAILURE TO SUBMIT DISCHARGE MONITORING REPORTS**

1. This Count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), pursuant to Section 31 of the Illinois Environmental Protection Act (the “Act”), 415 ILCS 5/31 (2020).

2. Illinois EPA is an agency of the State of Illinois, created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2020), and charged, *inter alia*, with the duty of enforcing the Act. Illinois EPA is further charged with the duty to abate violations of the National Pollutant Discharge Elimination System (“NPDES”) permit program under Section 402(b)(7) of the Federal Clean Water Act (“CWA”), 33 U.S.C. § 1342(b)(7).

3. The Illinois Pollution Control Board (“Board”) is an independent board created by the Illinois General Assembly created in Section 5 of the Act, 415 ILCS 5/5 (2020), and charged, *inter alia*, with the duty of promulgating standards and regulations under the Act.

4. Respondent, NORMA BONELLI-ZOOK (“Respondent”) was and is an individual doing business under the name of Fountain Valley Mobile Home Park, an unincorporated entity. The Fountain Valley Mobile Home Park is located at 1 Fountain Valley Road in Rantoul, Champaign County, Illinois (“Facility”). As of the date of filing of this Complaint, the Facility is in an area of Environmental Justice (“EJ”) concern as identified using Illinois EPA EJ Start mapping tool.

5. Respondent treats and discharges wastewater from the Facility.

6. The Facility’s treated wastewater discharge flows through its only outfall, Outfall 001, to an unnamed ditch tributary to Upper Salt Fork Creek.

7. Section 402 of the federal Clean Water Act (“CWA”), 33 U.S.C. §1342, establishes the NPDES program to address water pollution by regulating point sources that discharge pollutants to waters.

8. On May 29, 2018, Illinois EPA issued Respondent NPDES Permit No. IL0080135 (“the NPDES Permit”), which authorizes the discharge of the Facility’s wastewater from Outfall 001.

9. Special Condition 5 of the NPDES Permit provides, in pertinent part, as follows:

The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) electronic forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee is required to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA unless a waiver has been granted by the Agency. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, <http://www.epa.state.il.us/water/net-dmr/index.html>.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

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10. Respondent failed to timely submit Discharge Monitoring Reports for the Facility to Illinois EPA for the months of June 2020 through May 2021.

11. Section 12(a) of the Act, 415 ILCS 5/12(a) (2020), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge of any contaminants into the environment in any state so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.

12. Section 12(f) of the Act, 415 ILCS 5/12(f) (2020), provides as follows:

No person shall:

- (f) Cause, threaten or allow the discharge of any contaminant into the waters of the State, as defined herein, including but not limited to, waters to any sewage works, or into any well or from any point source within the State, without an NPDES permit for point source discharges issued by the Agency under Section 39(b) of this Act, or in violation of any NPDES permit filing requirement established under Section 39(b), or in violation of any regulations adopted by the Board or of any order adopted by the Board with respect to the NPDES program.

13. Section 3.315 of the Act, 415 ILCS 5/3.315 (2020), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

14. Respondent, an individual, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2020).

15. Section 3.165 of the Act, 415 ILCS 5/3.165 (2020), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

16. Wastewater which Respondent discharged from the Facility’s Outfall 001 is a “contaminant” as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2020).

17. Section 3.550 of the Act, 415 ILCS 5/3.550 (2020), provides the following definition:

“Waters” means all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon the State.

18. Upper Salt Fork Creek and the unnamed tributary to Upper Salt Fork Creek to which Outfall 001 discharges are “waters” as that term is defined in Section 3.550 of the Act, 415 ILCS 5/3.550 (2020).

19. Section 305.102(b) of the Board Regulations, 35 Ill. Adm. Code 305.102(b), provides as follows:

(b) Every holder of an NPDES (National Pollution Discharge Elimination System) permit is required to comply with the monitoring, sampling, recording and reporting requirements set forth in the permit and this Chapter.

20. Section 309.102(a) of the Board Regulations, 35 Ill. Adm. Code 309.102(a), provides as follows:

- (a) Except as in compliance with the provisions of the Act, Board regulations, and the CWA, and the provisions and conditions of the NPDES permit issued to the discharger, the discharge of any contaminant or pollutant by any person into the waters of the State from a point source or into a well shall be unlawful.

21. Section 401.11(d) of the Code of Federal Regulations (“C.F.R.”), 40 C.F.R.

401.11(d), provides as follows:

The term point source means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged.

22. Outfall 001 is a “point source” within the meaning of 40 C.F.R. 401.11(d).

23. By continuing to discharge wastewater from the Facility despite failing to submit discharge monitoring reports as required by its NPDES Permit from at least June 2020 through May 2021, Respondent caused, threatened, or allowed discharges from the Facility into waters of the State of Illinois in violation of its NPDES Permit, thereby violating Section 12(f) of the Act, 415 ILCS 5/12(f) (2020), Sections 305.102(b) and 309.102(a) of the Board Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and Special Condition 5 of the NPDES Permit.

24. By causing, threatening, or allowing discharges from the Facility into waters of the State of Illinois so as to violate regulations or standards adopted by the Board, Respondent violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2020).

**PRAYER FOR RELIEF**

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Board enter an order in favor of Complainant and against the Respondent, NORMA BONELLI-ZOOK, on Count I:

- A. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;
- B. Finding that Respondent violated the Act, Board regulations, and the NPDES Permit, as alleged herein;
- C. Ordering the Respondent to cease and desist from any further violations of the Act and Board regulations;
- D. Assessing against Respondent a civil penalty no greater than the maximum penalties set forth in Sections 42(a) and 42(b)(1) of the Act, 415 ILCS 5/42(a) and 42(b)(1) (2020);
- E. Ordering Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2020), including any attorney, expert witness, and consultant fees expended by the State in its pursuit of this action pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2020); and
- F. Granting such other relief as this Board deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,  
by KWAME RAOUL, Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

BY: /s/ Andrew Armstrong  
ANDREW B. ARMSTRONG, Chief  
Environmental Bureau  
Assistant Attorney General  
#6282447



Of Counsel

BRIDGET I FLYNN, # 6332314

Assistant Attorney General

500 South Second Street

Springfield, IL 62706

(217) 782-9033

[Bridget.flynn@ilag.gov](mailto:Bridget.flynn@ilag.gov)

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PEOPLE OF THE STATE OF ILLINOIS,	)	
by KWAME RAOUL, Attorney	)	
General of the State of Illinois,	)	
	)	
Complainant,	)	
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v.	)	PCB No.
	)	(Enforcement – Water (NPDES))
NORMA BONELLI-ZOOK, an individual	)	
d/b/a FOUNTAIN VALLEY MOBILE	)	
HOME PARK, an unincorporated entity,	)	
	)	
	)	
Respondent.	)	

**STIPULATION FOR PROPOSAL AND SETTLEMENT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency (“Illinois EPA”), and Respondent, NORMA BONELLI-ZOOK, an individual, d/b/a FOUNTAIN VALLEY MOBILE HOME PARK (the “Respondent”) (collectively “Parties to the Stipulation”) have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s entry of this Stipulation and issuance of any injunctive relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1 *et seq.* (2020), and the Board’s Regulations, alleged in the Complaint

except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

## I. STATEMENT OF FACTS

### A. Parties

1. Contemporaneously with the filing of this Stipulation, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2020), against the Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2020).

3. At all times relevant to the Complaint, Respondent, Norma Bonelli-Zook, (“the Respondent”) was and is an individual doing business under the name of Fountain Valley Mobile Home Park, an unincorporated entity, located at 1 Fountain Valley Road in Rantoul, Champaign County, Illinois, (“the Facility”).

4. On May 2018, Illinois EPA issued Respondent a National Pollutant Discharge Elimination System (“NPDES”) Permit No. IL0080135 (“the NPDES Permit”), which authorizes the discharge of the Facility’s wastewater from Outfall 1.

### B. Allegations of Non-Compliance

Complainant contends that the Respondent has violated the following provisions of the Act and Board Regulations:

Count I: Failure to Submit Discharge Monitoring Reports  
Sections 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2020), Sections 305.102(b) and 309.102(a) of the Board Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and Special Condition 5 of the NPDES Permit

**C. Admission of Violations**

The Respondent admits to the violations alleged in the Complaint filed in this matter and referenced within Section I.B herein.

**D. Compliance Activities to Date**

The Respondent submitted the Discharge Monitoring Reports (“DMRs”) for June 2020 through May 2021 to Illinois EPA on August 5, 2022.

**II. APPLICABILITY**

This Stipulation shall apply to and bind the Parties to the Stipulation. The Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against the Respondent in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2020).

**III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE**

Section 33(c) of the Act, 415 ILCS 5/33(c) (2012), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area

involved;

4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. The Illinois EPA's information gathering responsibilities were hindered by the Respondent's violations thereby threatening human health and the environment.
2. There is social and economic benefit to the facility.
3. Operation of the facility was and is suitable for the area in which it is located.
4. Compliance with the terms of the NPDES Permit is both technically practicable and economically reasonable.
5. Respondent has subsequently complied with the Act, the Board regulations, and the NPDES Permit.

#### **IV. CONSIDERATION OF SECTION 42(h) FACTORS**

Section 42(h) of the Act, 415 ILCS 5/42(h) (2012), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary

compliance with this Act by the respondent and other persons similarly subject to the Act;

5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. The Respondent failed to timely submit DMR's for the Facility in compliance with the NPDES permit. The violations began on or around June 2020, and were resolved on August 5, 2022.
2. Respondent was diligent in attempting to come back into compliance with the Act, Board regulations, and the NPDES Permit, once the Illinois EPA notified it of its noncompliance.
3. The civil penalty takes into account any economic benefit realized by the Respondent as a result of avoided or delayed compliance.
4. Complainant has determined, based upon the specific facts of this matter, that a penalty of SEVEN THOUSAND FIVE HUNDRED Dollars (\$7,500.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.
5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.
6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

## **V. TERMS OF SETTLEMENT**

### **A. Penalty Payment**

1. The Respondent shall pay a civil penalty in the sum of SEVEN THOUSAND FIVE HUNDRED Dollars (\$7,500.00) within thirty (30) days from the date the Board adopts this Stipulation.

### **B. Interest and Default**

1. If the Respondent fails to make any payment this Stipulation requires on or before the date upon which payment is due, the Respondent shall be in default and the remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, 415 ILCS 5/42(g) (2020), interest shall accrue on any penalty amount which the Respondent owes and has not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where the Respondent makes partial payment on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

### **C. Payment Procedures**

1. The Respondent shall make all payments required by this Stipulation by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection

Trust Fund ("EPTF"). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency  
Fiscal Services  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order.

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Bridget I. Flynn  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 S. Second Street  
Springfield, Illinois 62701-9276

**D. Future Compliance**

1. The Respondent shall comply with the terms and conditions of the NPDES Permit.

2. In addition to any other authorities, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon the Respondent's facility which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

3. This Stipulation in no way affects the responsibilities of the Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.



4. The Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

**E. Release from Liability**

In consideration of the Respondent's payment of a \$7,500.00 penalty, its commitment to cease and desist as contained in Section V.D.4 above, and completion of all activities required hereunder, the Complainant releases, waives and discharges the Respondent from any further liability or penalties for the violations of the Act and Board Regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed contemporaneously with this Stipulation. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violations of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damages arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

The Parties to the Stipulation intend nothing in this Stipulation as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315(2020), or entity other than the Respondent.

**F. Enforcement of Stipulation**

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order

is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

**G. Execution of Stipulation**

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.


WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

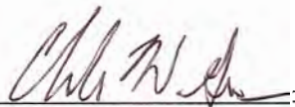
PEOPLE OF THE STATE OF ILLINOIS  
KWAME RAOUL  
Attorney General  
State of Illinois

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

JOHN J. KIM, Director  
Illinois Environmental Protection Agency

BY:   
RACHEL R. MEDINA  
Deputy Bureau Chief  
Environmental Bureau  
Assistant Attorney General

BY:   
CHARLES W. GUNNARSON  
Chief Legal Counsel

DATE: 8/16/23

DATE: 8/8/23

RESPONDENT:

  
NORMA BONELLI-ZOOK

DATE: 6-5-2023

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Respondent. )

PCB No. 24-  
(Enforcement – Water (NPDES))

**MOTION FOR RELIEF FROM HEARING REQUIREMENT**

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, and pursuant to Section 31(c)(2) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31(c)(2) (2022), moves that the Illinois Pollution Control Board (“Board”) grant the parties in the above-captioned matter relief from the hearing requirement imposed by Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2022). In support of this motion, Complainant states as follows:

1. The Complaint in this matter alleges violations of Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2022), Sections 305.102(b) and 309.102(a) of the Board’s regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a) (2022), and Special Condition 5 of the Defendant’s NPDES Permit.
2. Complainant filed its Complaint contemporaneously with the Stipulation.
3. The parties have reached agreement on all outstanding issues in this matter.
4. This agreement is presented to the Board in a Stipulation and Proposal for Settlement filed this same date.

5. All parties agree that a hearing on the Stipulation and Proposal for Settlement is not necessary, and respectfully request relief from such a hearing as allowed by Section 31(c)(2) of the Act, 415 ILCS 5/31(c)(2) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this Motion for Relief from Hearing Requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2022).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
by KWAME RAOUL, Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

By: /s/Bridget I. Flynn  
Bridget I. Flynn, #6332314  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706  
Office: (217) 782-9033  
Cell: (312) 848-5254  
*Briget.Flynn@ilag.gov*

Dated: August 21, 2023

**CERTIFICATE OF SERVICE**

I, Bridget I. Flynn, an Assistant Attorney General, certify that on the 21st day of August, 2023, I caused to be served by U.S. Certified Mail, the foregoing Notice of Filing, Complaint, Stipulation and Proposal for Settlement and Motion for Relief from Hearing Requirements to the parties named on the attached Service List, by depositing same in postage prepaid envelopes with the United States Postal Service located at 500 South Second Street, Springfield, Illinois 62701.

By: /s/Bridget I. Flynn  
Bridget I. Flynn, #6332314  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
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Springfield, Illinois 62706  
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