

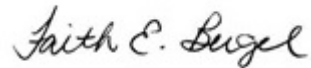
BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, PRAIRIE RIVERS	)	
NETWORK, and NATIONAL	)	
ASSOCIATION FOR THE	)	
ADVANCEMENT OF COLORED PEOPLE,	)	
	)	
Complainants,	)	
	)	PCB 18-11
v.	)	(Enforcement – Water)
	)	
CITY OF SPRINGFIELD, OFFICE OF	)	
PUBLIC UTILITIES d/b/a CITY WATER,	)	
LIGHT AND POWER	)	
	)	
Respondent.	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed a true and correct copy of **PRELIMINARY WITNESS LIST** and **PRELIMINARY EXHIBIT LIST** via electronic mail to the parties listed on the attached service list before 5:00 p.m.

Respectfully submitted,



Faith E. Bugel
1004 Mohawk
Wilmette, IL 60091
(312) 282-9119
FBugel@gmail.com
Attorney for Sierra Club

Dated: September 11, 2026

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, PRAIRIE RIVERS	)	
NETWORK, and NATIONAL	)	
ASSOCIATION FOR THE	)	
ADVANCEMENT OF COLORED PEOPLE,	)	
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Complainants,	)	
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CITY OF SPRINGFIELD, OFFICE OF	)	
PUBLIC UTILITIES d/b/a CITY WATER,	)	
LIGHT AND POWER	)	
	)	
Respondent.	)	

PRELIMINARY WITNESS LIST

Caroline Weinberg
P.J. Becker
Eric Staley
Brad J. Hunsberger

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, PRAIRIE RIVERS	)	
NETWORK, and NATIONAL	)	
ASSOCIATION FOR THE	)	
ADVANCEMENT OF COLORED PEOPLE,	)	
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v.	)	(Enforcement – Water)
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CITY OF SPRINGFIELD, OFFICE OF	)	
PUBLIC UTILITIES d/b/a CITY WATER,	)	
LIGHT AND POWER	)	
	)	
Respondent.	)	

PRELIMINARY EXHIBIT LIST

Complainants reserve the right to identify further evidence and exhibits for cross-examination, impeachment, or rebuttal. Complainants reserve the right to use exhibits admitted through an earlier witness with a subsequent witness without referencing or repeating them on Complainants' exhibit list. Complainants reserve the right to use exhibits introduced by Respondent.

	Exhibit Title	Bates Number	Date	Witnesss	Obj.
1.	4.03: Letter to Darin LeCrone	CWLP- 00986-00987	January 11, 2018	Becker	
2.	4.06: IEPA Violation Notice	CWLP-01110-01115	Feb. 20, 2014	Becker	
3.	4.07: Letter to Andrea Rhodes, Michael Crumly re Violation Notice	CWLP-01116-01119	April 2, 2014	Becker	
4.	4.08: Letter re Meeting Scheduled re Violation Notice	CWLP - 01120	April 11, 2014	Becker	
5.	4.09: Letter Confirming Meeting Held re Violation Notice	CWLP - 01121	April 23, 2014	Becker	
6.	4.10: Letter to IEPA Proposing CCA	CWLP - 01122 - 01125	May 12, 2014	Becker	
7.	4.33: Letter to IEPA with Information Request Response	CWLP 01387 - 01392	April 19, 2013	Becker	
8.	30.1: Letter to Sue Corcoran re Groundwater Evaluation/Investigation at	CWLP 27096 - 27125	March 8, 2014	Becker	

Electronic Filing: Received, Clerk's Office 09/11/2026

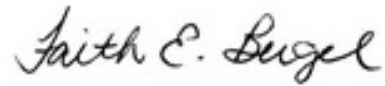
	the Facility Ash Impoundments				
9.	30.02: Draft Letter to IEPA re sample list	CWLP 27126 - 27127	January 9, 2018	Becker	
10.	2022 State Annual Groundwater Monitoring Report	44 pp, no Bates	Jan. 2023	Becker	
11.	2023 State Annual Groundwater Monitoring Report	394 pp, no Bates	Jan. 2024	Becker	
12.	2024 State Annual Groundwater Monitoring Report	491 pp, no Bates	Jan. 2025	Becker	
13.	2025 State Annual Groundwater Monitoring Report	552 pp, no Bates	Jan. 2026	Becker	
14.	2025 Federal Annual Groundwater Monitoring Report	515 pp, no Bates	Jan. 2026	Becker	
15.	5.23: Part 1 & 2: USEPA Notice of Violations - Dallman and Lakeside Ash Ponds	CWLP - 30494-30621	Nov. 28, 2022	Becker	
16.	5.25: Notice of Violation for Landfill	CWLP - 30633-30678	July 6, 2023	Becker	
17.	5.26: Signed Letter: USEPA Notice of Violations - Dallman and Lakeside Ash Ponds	CWLP 30679-30680	Oct. 4, 2023	Becker	
18.	5.29: RCRA Consent Agreement and Final Order	CWLP - 30706 - 30807	January 13, 2025	Becker	
19.	Q1 2025 Notification of Exceedances	2 pp, no Bates	July 15, 2025	Becker	
20.	Q4 2025 Notification of Exceedances	2 pp, no Bates	Apr. 15, 2026	Becker	
21.	Q3 2025 Notification of Exceedances	2 pp, no Bates	Jan. 15, 2026	Becker	
22.	Q2 2025 Notification of Exceedances	2 pp, no Bates	Oct. 15, 2025	Becker	
23.	Q1 2026 Notification of Exceedances	2 pp, no Bates	July 15, 2026	Becker	
24.	Q1 2024 Notification of Exceedances	2 pp, no Bates	July 11, 2024	Becker	
25.	Q2 2024 Notification of Exceedances	2 pp, no Bates	October 11, 2024	Becker	

26.	Q3 2024 Notification of Exceedances	2 pp, no Bates	Jan. 15, 2025	Becker	
27.	Q4 2024 Notification of Exceedances	2 pp, no Bates	Apr. 15, 2025	Becker	
28.	EPA-HQ-OLEM-2019-0172: Proposed Date to Cease Receipt of Waste for Dallman Power Station based on Interim Determination of Incompleteness of Demonstration	15 pp, no Bates	Jan. 25, 2022	Becker	
29.	The State Journal Register: Heavy rain, wind hammer Springfield	9 pp, no Bates	Dec. 28, 2015	Hunsberger	
30.	40 CFR 257	155 pp, no bates	None	Hunsberger	
31.	5.12: USEPA Coal Ash Impoundment Site Assessment Final Report	CWLP 01616 - 01693	May 10, 2011	Hunsberger	
32.	4.01: Emails Batch 4: Illinois Government Groundwater Combined	CWLP 00162-00191	Apr. 9, 2018	Hunsberger	
33.	4.12: Letter to Alan Keller, IEPA Permit Section	CWLP 01127 - 01168	May 30, 2012	Hunsberger	
34.	4.04: Letter to Alan Keller re Background Groundwater Concentrations	CWLP 00988 - 01100	June 21, 2013	Hunsberger	
35.	30.1: Letter to Sue Corcoran re Groundwater Evaluation/Investigation at the Facility Ash Impoundments	CWLP 27096 - 27125	Mar. 17, 2014	Hunsberger	
36.	35 Ill. Admin. Code Part 845	142 pp, no Bates	None	Hunsberger	
37.	35 Ill. Admin Code Part 620	82 pp, no Bates	None	Hunsberger	
38.	30.02: Draft Letter to IEPA re sample list	CWLP 27126 - 27127	January 9, 2018	Staley	

CERTIFICATE OF SERVICE

The undersigned, Faith E. Bugel, an attorney, certifies that I have served electronically upon the Clerk and by email upon the individuals named on the attached Service List a true and correct copy of **PRELIMINARY WITNESS LIST** and **PRELIMINARY EXHIBIT LIST** before 5 p.m. Central Time on September 11, 2026 to the email addresses of the parties on the attached Service List. The entire filing package, including exhibits, is 4 pages.

Respectfully submitted,

A handwritten signature in black ink that reads "Faith E. Bugel". The signature is written in a cursive, flowing style.

Faith E. Bugel
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Wilmette, IL 60091
(312) 282-9119
FBugel@gmail.com
Attorney for Sierra Club