

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB NO.
)	(Enforcement)
CITY OF CHARLESTON,)	
an Illinois municipal corporation,)	
)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

To: See Attached Service List


PLEASE TAKE NOTICE that on February 17, 2011, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, c/o John T. Therriault, Assistant Clerk, James R. Thompson Center, 100 W. Randolph St., Ste. 11-500, Chicago, IL 60601, a MOTION FOR RELIEF FROM HEARING REQUIREMENT and STIPULATION AND PROPOSAL FOR SETTLEMENT, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the
State of Illinois

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

BY: 
Christine Zeivel
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: February 17, 2011

CERTIFICATE OF SERVICE

I hereby certify that I did on February 17, 2011, cause to be served by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box in Springfield, Illinois, a true and correct copy of the following instruments entitled NOTICE OF ELECTRONIC FILING, MOTION FOR RELIEF FROM HEARING REQUIREMENT and STIPULATION AND PROPOSAL FOR SETTLEMENT upon the persons listed on the Service List.


Christine Zeivel
Assistant Attorney General

This filing is submitted on recycled paper.

SERVICE LIST

Brian L. Bower
City of Charleston Attorney
520 Jackson Avenue
Charleston, IL 61920

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB NO. 10-102
)	(Enforcement - Water)
CITY OF CHARLESTON,)	
an Illinois municipal corporation,)	
)	
Respondent.)	

MOTION FOR RELIEF FROM HEARING REQUIREMENT

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, 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) (2008), moves that the Illinois Pollution Control 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) (2008). In support of this motion, Complainant states as follows:

1. On June 9, 2010, a Complaint was filed with the Illinois Pollution Control Board ("Board") in this matter.
2. The parties have reached agreement on all outstanding issues in this matter.
3. This agreement is presented to the Board in a Stipulation and Proposal for Settlement, filed contemporaneously with this motion.
4. 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) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this motion for relief from the hearing requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2008).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
LISA MADIGAN
ATTORNEY GENERAL

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

BY:



Christine Zeivel
Environmental Bureau
Assistant Attorney General

500 South Second Street
Springfield, Illinois 62706
217/782-9031

Dated: February 17, 2011

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 10-102
)	(Enforcement - Water)
CITY OF CHARLESTON,)	
an Illinois municipal corporation,)	
)	
Respondent.)	

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency ("Illinois EPA"), and the City of Charleston ("Respondent")("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. The parties agree that the statement of facts contained herein represents a fair summary of the evidence and testimony which would be introduced by the parties if a hearing were held. The parties further stipulate that this statement of facts is made and agreed upon for purposes of settlement only and that neither the fact that a party has entered into this Stipulation, nor any of the facts stipulated herein, shall be introduced into evidence in any other proceeding regarding the claims asserted in the Complaint except as otherwise provided herein. If the Board approves and enters this Stipulation, Respondent agrees to be bound by the Stipulation and Board Order and not to contest their validity in any subsequent proceeding to implement or enforce their terms.

I. STATEMENT OF FACTS

A. Parties

1. On June 9, 2010, a Complaint was filed on behalf of the People of the State of Illinois by Lisa Madigan, Attorney General of the State of Illinois, on her own motion and upon

the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31(2008), 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 (2008).

3. At all times relevant to the Complaint, Respondent was and is an Illinois municipal corporation that is authorized to transact business in the State of Illinois.

B. Site Description

1. Respondent owns and operates a wastewater treatment facility ("WWTF") that includes a sanitary sewer system, with its main plant located at West Madison Avenue in Charleston, Coles County, Illinois.

2. The WWTF discharges treated municipal sewage to Cassell Creek pursuant to National Pollutant Discharge Elimination System ("NPDES") Permit No. IL0021644. Cassell Creek is a tributary to Riley Creek, which is a tributary to Kickapoo Creek.

3. Under the terms of Respondent's NPDES permit, the dissolved oxygen limit for effluent shall not be less than 6 mg/L.

4. On September 17, 2005, the Respondent reported a direct discharge of sewage from its main pump station into Town Branch Creek, a branch of Cassell Creek, to the Illinois EPA. Within five hours, an estimated 600,000 gallons of untreated sewage entered the Town Branch Creek.

5. On September 19, 2005, the Illinois EPA conducted an inspection of the Respondent's WWTP and its receiving waters. Dead fish were observed in Town Branch Creek, Cassell Creek and Riley Creek. Samples taken from Cassell Creek, Riley Creek and Kickapoo Creek revealed dissolved oxygen levels of 6.82 mg/L (Cassell Creek upstream), 3.11 mg/L (Cassell Creek downstream), 3.59 mg/L (Riley Creek) and 8.74 mg/L (Kickapoo Creek).

6. On October 12, 2005, the Illinois Department of Natural Resources reported that the fish kill stretched for almost two miles and totaled approximately 29,988 fish. Dollar value of the fish kill was estimated at \$5,738.00.

7. On April 6, 2006, the Respondent reported to the Illinois EPA that two of its pump stations had experienced overflows. The Reynolds Drive pump station discharged through its overflow manhole into an intermittent stream that enters Kickapoo Creek for over four hours and the diversion structure prior to the main pump station discharged into the Town Branch Creek for over seven hours.

8. On December 22, 2006, the Respondent reported a combined sewer overflow at its diversion structure prior to the main pump station to the Illinois EPA. An estimated 2.25 million gallons of storm water/wastewater entered the Town Branch Creek during the overflow.

9. On January 19, 2007, the Respondent reported that it experienced a discharge at its diversion structure prior to the main pump station on January 15, 2007 to the Illinois EPA. An estimated 1.03 million gallons of storm water/wastewater entered the Town Branch Creek over a seven hour period.

10. On February 20, 2007, the Respondent reported that it experienced a discharge at its Stoner Drive pump station on February 17, 2007.

11. On February 26, 2007, the Respondent reported that it experienced an overflow at its the diversion structure prior to the main pump station on February 24, 2007.

12. On April 11, 2008, the Respondent reported a collection system overflow at its preliminary treatment units.

13. On May 30, 2008, the Respondent reported a sanitary sewer overflow at its main pump station with discharge into the Town Branch Creek.

14. On June 7, 2008, the Respondent reported a sanitary sewer overflow at its

Reynolds lift station.

15. On July 1, 2008, the Respondent reported that it experienced a collection system overflow at its Stoner Street lift station on June 30, 2008.

16. On August 26, 2008, the Respondent reported a sanitary sewer overflow near a manhole located between 14th and 15th Streets from a twelve inch sewer that runs under an unnamed tributary to Cassell Creek.

17. On February 11, 2009, the Respondent experienced a collection system overflow at its Reynolds lift station and a second overflow from Outfall Number 002 for a duration of at least three hours.

18. On October 21, 2009, the Respondent reported that it experienced an overflow of primary anaerobic sludge/foam to the facility's stormwater collection system on October 19, 2009.

C. Allegations of Non-Compliance

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

Count I: Water Pollution

By causing or allowing the discharge of contaminants and wastewater into the environment so as to cause water pollution resulting in a fish kill, the Respondent violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008) and Section 309.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a).

By depositing contaminants upon the land in such manner and place so as to create a water pollution hazard, the Respondent violated Section 12(d) of the Act, 415 ILCS 5/12(d) (2008)

By discharging contaminants into waters of the State containing sludge or bottom deposits, floating debris, color or turbidity of other than natural origin, the Respondent

violated Section 302.203 of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 302.203.

By discharging untreated wastewater containing settleable solids, floating debris, or sludge solids, the Respondent violated Section 304.106 of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 304.106.

By causing or allowing sewer overflows, the Respondent violated Section 306.304 of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 306.304.

Count II: Operational Violations

By failing to construct and operate its WWTF so as to minimize violations of applicable standards during flooding, adverse weather, equipment failure, or maintenance, the Respondent violated Section 306.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 306.102(a).

By failing to take all reasonable measures to prevent spillage of contaminants from causing water pollution, the Respondent violated Section 306.102(b) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 306.102(b).

Count III: NPDES Permit Violations

By discharging contaminants into waters of the state in violation of its NPDES permit, the Respondent violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2008), and Section 309.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a).

By discharging contaminants in its effluent in excess of the standards and limitations set forth in its NPDES permit, the Respondent violated Section 304.141(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a).

D. Admission of Violations

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

E. Compliance Activities to Date

On January 25, 2006, the Respondent paid \$5,738.00, the value of the aquatic life

destroyed by its September 17, 2005 discharge event, to the Illinois Department of Natural Resources for deposit in the Illinois Wildlife and Fish Fund. The Respondent has passed and is enforcing a city ordinance to reduce inflow and infiltration into the sanitary sewer system and has conducted additional operator training and monitoring in efforts to reduce incidence of overflow from its WWTF. Additionally, the Respondent has committed to expending over \$7.25 million on a total facility upgrade and an additional \$170,000 annually to a capital allocation program in order to adequately fund its newly-instituted preventative maintenance program ("PMP"). The Respondent is currently active in upgrading its treatment facilities, and has completed the following improvements to reduce incidence of overflow:

1. In August 2009, the Respondent performed the following improvements at its Reynolds lift station:
 - a. Installed a new motor control center and panel, along with dual controls;
 - b. Overhauled all four existing pumps; and
 - c. Installed one additional pump that runs in automatic mode.
2. In August 2009, the Respondent performed the following improvements at the manhole between 14th and 15th Streets and its associated portion of the sewer system:
 - a. Abandoned and removed twelve inch sewer line that ran under Town Branch Creek from the system; and
 - b. Rehabilitated all remaining sewer lines that run under area creeks.
3. In September 2009, the Respondent replaced the air bubbler at its Stoner Drive pump station with a New Multitrode Level Control System.
4. In September 2009, the Respondent installed a new supervisory control and data acquisition ("SCADA") system that utilizes programmable logic controllers ("PLCs") to improve monitoring, warning, control and response capabilities throughout its WWTF by means of

internet and cellular technology.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties. 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. No change in ownership, corporate status or operator of the facility shall in any way alter the responsibilities of the Respondent under this Stipulation and Proposal for Settlement. In the event of any conveyance of title, easement or other interest in the facility, the Respondent shall continue to be bound by and remain liable for performance of all obligations under 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 (2008).

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

Section 33(c) of the Act, 415 ILCS 5/33(c) (2008), 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 state the following:

1. The overflow of treated and untreated sewage from the Respondent's facilities threatened human health and the environment.
2. The Respondent's WWTF and sanitary sewer system has both social and economic benefit.
3. Operation of the WWTF and sanitary sewer system was suitable for the area in which it occurred.
4. Reducing the discharges from Respondent's WWTF and sanitary sewer system is both technically practicable and economically reasonable.
5. Respondent has subsequently complied with the Act and Board Regulations.

IV. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (2008), 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; and
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.

In response to these factors, the parties state as follows:

1. The violations began on September 17, 2005, resulting in a fish kill, and continued through October 21, 2009.
2. Respondent was diligent and prompt in notifying the Illinois EPA of its discharge events. Additionally, while the string of overflows may indicate that the Respondent previously lacked diligence in its maintenance of its WWTF and sanitary sewer system, the Respondent has since adopted a proactive approach to upgrading and maintaining its WWTF so as to ensure compliance with the Act and Board regulations.
3. The costs associated with repairing or replacing the City's sewage system far outweighs the economic benefit gained by the City by delaying the costs of planning, permitting and constructing needed improvements.
4. Complainant has determined, based upon the specific facts of this matter, that a penalty of twenty three thousand and eight hundred dollars (\$23,800.00) will serve to deter future violations and to encourage the Respondent and other municipalities to proactively maintain and upgrade their wastewater treatment and sewage systems in order to remain in compliance with the Act and the limits set forth in their permits and the Board's regulations.
5. To Complainant's knowledge, the Illinois EPA has initiated enforcement actions

against the Respondent on three separate occasions in the last ten years for similar violations related to the Respondent's failure to adequately operate, maintain or test its equipment in order to prevent failing and causing or threatening to cause water pollution.

6. In accordance with requirements, the Respondent notified the Illinois EPA of its overflow violations.

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

V. TERMS OF SETTLEMENT

A. Penalty Payment

The Respondent shall pay a civil penalty in the sum of Twenty Three Thousand and Eight Hundred Dollars (\$23,800.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Interest and Default

1. If the Respondent fails to make any payment required by this Stipulation on or before the date upon which the 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, the Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by the Respondent 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 partial payment is made 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

All payments required by this Stipulation shall be made 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

The name, case number and the Respondent's federal tax identification number shall appear on the face of the certified check or money order. A copy of the certified check or money order and any transmittal letter shall be sent to:

Christine Zeivel, AAG
Environmental Enforcement Bureau
Illinois Attorney General's Office
500 South Second Street
Springfield, Illinois 62706

D. Future Compliance

1. In order to improve the reliability of equipment and thus the operation of its WWTF so as to minimize violations of applicable standards during flooding, adverse weather, equipment failure, or maintenance, the Respondent shall complete the following improvements at its WWTF by August 31, 2011:

- a. Raise the outside walls and trough walls of primary clarifiers and the primary clarifier influent diversion structure by two feet to allow for free fall over the weirs and at the drop box;
- b. Rebuild or replace primary clarifier scraper mechanisms, scum beaches, weirs/baffles, drive units and collector units;
- c. Install fourth secondary clarifier and associated air lift pump, sludge

- piping and sluice gate;
- d. Install density current baffles in all four secondary clarifiers to prevent short circuiting of solids;
- e. Construct a lagoon drain pump system to drain the excess flow lagoons and to pump water in the lagoons to the front of the plant or to the secondary clarifiers as influent flows allow;
- f. Remove old air valves and install flange system for all pumps;
- g. Aeration tank modifications, including the replacement of all air diffusers with fine bubble diffusers and the installation of new influent structure, RAS pumps and airlift pumps;
- h. Install new scum collection system and level sensors to better monitor levels;
- i. Bring the following equipment back into operation:
 - i. Mechanically cleaned bar screen;
 - ii. Grit chamber and related equipment; and
 - iii. Belt filter press.
- j. Replace existing polymer feed system with a new system;
- k. Install new standby generators at the influent pump station and in the administration building at the main plant; and
- l. Install new valving and piping as needed.

2. The Respondent shall submit reports documenting significant progress made on its WWTF upgrade project, including those items outlined in Section D.1 above, on March 1, 2011, June 1, 2011 and September 1, 2011. Reports shall be submitted to:

Joe Koronkowski
Illinois Environmental Protection Agency
Division of Water Pollution Control
Field Operations Section
2125 South First Street
Champaign, Illinois 61820

Copies of all reports submitted pursuant to this Section shall also be sent to:

Christine Zeivel, AAG
Environmental Enforcement Bureau
Illinois Attorney General's Office
500 South Second Street
Springfield, Illinois 62706

3. The Respondent shall continue to employ a PMP throughout its facility, including expenditures on capital improvements necessary to minimize violations of applicable standards during flooding, adverse weather, equipment failure and maintenance.

4. The Respondent shall perform routine operator training and monitoring to ensure proper operation of its WWTF.

5. In addition to any other authorities, the Illinois EPA, its employees and representatives, and the Attorney General, her 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, her employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

6. 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.

7. The Respondent shall cease and desist from future violations of the Act and

Board Regulations that were the subject matter of the Complaint.

F. Release from Liability

In consideration of the Respondent's payment of the \$23,800.00 penalty and its commitment to cease and desist as contained in Section V.D.7 above, and upon the Board's approval of this Stipulation, 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 on June 9, 2010. 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 violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended 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 or the Illinois EPA may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than the Respondent.

F. Enforcement and Modification 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.

AGREED:

PEOPLE OF THE STATE OF ILLINOIS,

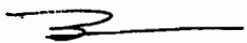
FOR THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

LISA MADIGAN
Attorney General
State of Illinois

DOUGLAS P. SCOTT, Director
Illinois Environmental Protection Agency

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

BY:



THOMAS DAVIS, Chief
Environmental Bureau

BY:



JOHN S. KIM
Chief Legal Counsel

DATE:

2/17/11

DATE:

2/15/11

CITY OF CHARLESTON

BY:



Name: John Inyart

Title: Mayor

BY:



Name: Brian L. Bower

Title: City Attorney

DATE:

December 27, 2010

DATE:

January 11, 2011