

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>PEOPLE OF THE STATE OF ILLINOIS,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>PCB NO. 18-</b>
	)	<b>(Enforcement - Water)</b>
<b>VILLAGE OF MARINE, an Illinois municipal,</b>	)	
<b>Corporation,</b>	)	
	)	
<b>Respondent.</b>	)	

**NOTICE OF FILING**

**SEE ATTACHED CERTIFICATE OF SERVICE**

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board the Complaint, Stipulation and Proposal for Settlement, and Motion for Relief from Hearing Requirement, of the People of the State of Illinois by LISA MADIGAN, Attorney General of the State of Illinois, a copy of which is herewith served upon you.

s/Raymond Callery  
 Raymond Callery  
 Assistant Attorney General  
 Environmental Bureau  
 500 South Second Street  
 Springfield, Illinois 62701  
 (217) 782-9031  
[rcallery@atg.state.il.us](mailto:rcallery@atg.state.il.us)  
[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)

Dated: March 5, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2018, via electronic mail and regular mail as indicated, I served a true and correct copy of the Notice of Filing, Complaint, Stipulation and Proposal for Settlement, and Motion for Relief from Hearing Requirements to:

Brian E. Konzen  
1939 Delmar Avenue  
P.O. Box 735  
Granite City IL 62040-0735  
bkonzen@lrklaw.com

John Molitor  
Marine Village Hall  
320 N. Vernon  
P.O. Box 136  
Marine IL 62061

BY: s/Raymond Callery  
Raymond Callery  
Assistant Attorney General

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>PEOPLE OF THE STATE OF ILLINOIS,</b>	)	
<b>LISA MADIGAN, Attorney General of the</b>	)	
<b>State of Illinois,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>vs.</b>	)	<b>PCB No.</b>
	)	<b>(Enforcement – Water)</b>
	)	
<b>VILLAGE OF MARINE,</b>	)	
<b>an Illinois municipal corporation,</b>	)	
	)	
<b>Respondent.</b>	)	

**COMPLAINT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, complains of Respondent, VILLAGE OF MARINE, an Illinois municipal corporation, as follows:

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

1. This Complaint is brought on behalf of the People of the State of Illinois, by Lisa Madigan, the Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA" or "the Agency").

2. This Complaint is brought pursuant to Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31 (2016), after providing the Respondent with notice and the opportunity for a meeting with the Illinois EPA.

3. The 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 (2016), and charged, *inter alia*, with the duty of enforcing the Act.

4. Respondent is a municipal corporation located in Madison County with

approximately 960 residents.

5. Respondent's wastewater treatment plant consists of a two cell aerated lagoon with a rock filter located at Route 4 and Loos Road, Marine, Madison County, Illinois ("Facility" or "Site").

6. On December 30, 2002, the Illinois EPA issued Respondent National Pollutant Discharge Elimination System ("NPDES") Permit No. IL G580228 and on February 25, 2015, Illinois EPA renewed NPDES Permit No. ILG580228 (the "NPDES Permit").

7. On January 28, 2016, the Illinois EPA conducted an inspection of Respondent's wastewater treatment plant.

8. Section 12 of the Act, 415 ILCS 5/12 (2016), provides, in pertinent part, 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 term or condition imposed by such permit, 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.

\* \* \*

9. Pursuant to the NPDES Permit, Respondent is required to perform certain discharge monitoring and record the sampling results from monitoring the discharges of its wastewater treatment plant in Discharge Monitoring Reports ("DMR's"). DMR's must be submitted to the Illinois EPA monthly.

10. A review of records following the January 28, 2016 inspection revealed that Respondent had not submitted DMR's since June 2014. As of the filing of this Complaint,

Respondent has filed all of its DMR's with the majority of the late DMR's being filled in September 2016.

11. Section 305.102(b) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b), provides as follows:

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

12. Respondent failed to timely submit to the Illinois EPA monthly DMR's as required by its NPDES permit.

13. By failing to comply with the reporting requirements of its NPDES permit, Respondent violated Section 305.102(b) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b), and Section 12(f) of the Act, 415 ILCS 5/12(f) (2016).

**PRAYER FOR RELIEF**

WHEREFORE, the Complainant, the PEOPLE OF THE STATE OF ILLINOIS, respectfully request that the Board enter an order against the Respondent, VILLAGE OF MARINE:

- A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;
- B. Finding the Respondent has violated the Act and the regulations as alleged herein;
- C. Ordering the Respondent to cease and desist from any further violations of the Act and associated regulations;
- D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2016) impose a civil penalty of not more than the statutory maximum; and
- E. Granting such other relief as the Board may deem appropriate.

**COUNT II**  
**FAILURE TO HAVE PROPERLY CERTIFIED OPERATOR**

1-8. Respondent realleges and incorporates by reference paragraphs 1 through 8 of Count I as if fully set forth herein as paragraphs 1 through 8 of this Count II.

9. Under Special Condition Number 1 of the Respondent's NPDES Permit, operation of the wastewater treatment plant must be by or under the supervision of a Certified Class 4 operator.

10. A review of records following the January 28, 2016 inspection revealed that Respondent did not have a Certified Class 4 operator.

11. Section 312.101 of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 312.101, provides as follows:

No person shall cause or allow the use or operation of any treatment works for which a permit is required by Part 309 unless the operation of such treatment works is under the direct and active field supervision of a person who has been certified by the Agency as being competent to operate the particular type or size of treatment works being used or operated.

12. In October 2017, Respondent submitted to Illinois EPA a contract for a Certified Class 4 Operator and the contract was approved.

13. By failing to have Certified Class 4 operator, Respondent violated Section 312.101 of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 312.101, and Section 12(f) of the Act, 415 ILCS 5/12 (2016).

**PRAYER FOR RELIEF**

WHEREFORE, the Complainant, the PEOPLE OF THE STATE OF ILLINOIS, respectfully request that the Board enter an order against the Respondent, VILLAGE OF MARINE:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding the Respondent has violated the Act and the regulations as alleged herein;

C. Ordering the Respondent to cease and desist from any further violations of the Act and associated regulations;

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2016) impose a civil penalty of not more than the statutory maximum; and

E. Granting such other relief as the Board may deem appropriate.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* LISA MADIGAN,  
Attorney General of the  
State of Illinois

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

BY:   
ANDREW ARMSTRONG, Chief  
Environmental Bureau  
Assistant Attorney General

Of Counsel  
RAYMOND J. CALLERY  
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Springfield, Illinois 62706  
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[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)

Dated: March 5, 2018.

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>PEOPLE OF THE STATE OF ILLINOIS,</b>	)	
<b>LISA MADIGAN, Attorney General of the</b>	)	
<b>State of Illinois,</b>	)	
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<b>Complainant,</b>	)	
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<b>vs.</b>	)	<b>PCB No.</b>
	)	<b>(Enforcement – Water)</b>
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<b>VILLAGE OF MARINE,</b>	)	
<b>an Illinois municipal corporation,</b>	)	
	)	
<b>Respondent.</b>	)	

**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 VILLAGE OF MARINE, an Illinois municipal corporation (“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 approval of this Stipulation and issuance of 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. (2016), 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. On March 5, 2018, 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 (2016), 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 (2016).

3. Respondent is a municipal corporation located in Madison County with approximately 960 residents.

4. Respondent's wastewater treatment plant consists of a two cell aerated lagoon with a rock filter located at Route 4 and Loos Road, Marine, Madison County, Illinois ("Facility").

5. On December 30, 2002, the Illinois EPA issued Respondent National Pollutant Discharge Elimination System ("NPDES") Permit No. IL G580228 and on February 25, 2015, Illinois EPA renewed NPDES Permit No. ILG580228 (the "NPDES Permit").

6. Pursuant to the NPDES Permit, Respondent is required to perform certain discharge monitoring and record the sampling results from monitoring the discharges of its wastewater treatment plant in Discharge Monitoring Reports ("DMR's"). DMR's must be submitted to the Illinois EPA monthly.

7. Under Special Condition Number 1 of Respondent's NPDES Permit, operation of the wastewater treatment plant must be by or under the supervision of a Certified Class 4 operator.

**B. Allegations of Non-Compliance**

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

Count I:        FAILURE TO SUBMIT DISCHARGE  
MONITORING REPORTS  
35 Ill. Adm. Code 305.102(b)  
415 ILCS 5/12(f) (2016)

Count II:       FAILURE TO HAVE PROPERLY  
CERTIFIED OPERATOR  
35 Ill. Adm. Code 312.101  
415 ILCS 5/12(f) (2016)

**C.     Admission of Violations**

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**

1.     As of December 3, 2017, Respondent has submitted to Illinois EPA all outstanding DMR's for the Facility, with the majority of the late DMR's having been submitted in September 2016.

2.     In October 2017, Respondent submitted to Illinois EPA a contract for a Certified Class 4 Operator. The Illinois EPA subsequently approved the contract.

**II.    APPLICABILITY**

This Stipulation shall apply to and be binding upon 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 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 (2016).

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

Section 33(c) of the Act, 415 ILCS 5/33(c) (2016), 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 and assurance of the Facility's proper operation were hindered by Respondent's violations thereby threatening 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. Submitting DMR's in a timely manner and maintaining a properly certified operator are both technically practicable and economically reasonable.
5. Respondent has subsequently complied with the Act and the Board regulations.

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

Section 42(h) of the Act, 415 ILCS 5/42(h) (2016), 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. Respondent's failure to submit DMR's commenced in 2014. Many late DMR's were submitted in 2016. Respondent did not become current on its DMR's until December

2017. As of January 2016, Respondent lacked a properly certified operator. In October 2017, Respondent submitted to Illinois EPA a contract for a Certified Class 4 Operator, which was subsequently approved.

2. Respondent did not respond to the Non-Compliance Advisory letter nor Violation Notice sent by the Illinois EPA. Respondent has not been prompt in submitting overdue DMR's.

3. The civil penalty takes into account any economic benefit realized by 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 Three Thousand Two Hundred Fifty Dollars (\$3,250.00) 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**

Respondent shall pay a civil penalty in the sum of Three Thousand Two Hundred Fifty Dollars (\$3,250.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

**B. Interest and Default**

1. If Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, 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 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**

1. 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, Illinois 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:

Raymond J. Callery  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62701

**D. Future Compliance**

1. 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 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.

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

3. 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 Respondent's payment of the \$3,250.00 penalty, its commitment to cease and desist as contained in Section V.D.3 above, completion of all activities required hereunder, and upon the Board's approval of this Stipulation, the Complainant releases, waives and discharges 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 March 5, 2018. Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against 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 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 may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than 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. Opportunity For Public Comment**

Pursuant to 35 Ill. Adm. Code 103.306, the Board shall publish a notice of this Stipulation in the Environmental Register for at least 30 days prior to the Board accepting the Stipulation. If public comments are submitted to the Board regarding this Stipulation, Complainant reserves the right to withdraw its consent if the comments regarding the Stipulation



disclose facts or considerations which indicate that the Stipulation is inappropriate, improper, or inadequate. Respondent consents to the entry of this Stipulation without further notice and agrees not to withdraw from or oppose acceptance of this Stipulation or to challenge any provision of the Stipulation, unless Complainant has notified Respondent in writing that it withdraws or withholds its consent for the Stipulation. In the event Complainant notifies Respondent that it withdraws or withholds its consent for the Stipulation, then the terms of the agreement may not be used as evidence in any litigation between those entities.

**H. 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.

[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]

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

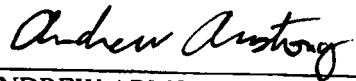
PEOPLE OF THE STATE OF ILLINOIS


LISA MADIGAN  
Attorney General  
State of Illinois

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

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

ALEC MESSINA, Director  
Illinois Environmental Protection Agency

BY:   
ANDREW ARMSTRONG, Chief  
Assistant Attorney General  
Environmental Bureau

BY:   
JOHN J. KIM  
Chief Legal Counsel

DATE: 02/28/2018

DATE: 2/27/18

VILLAGE OF MARINE

BY: 

TITLE: Mayor

DATE: 2-9-18

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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	)	
<b>Complainant,</b>	)	
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<b>vs.</b>	)	<b>PCB No. 18-</b>
	)	<b>(Enforcement)</b>
<b>VILLAGE OF MARINE, an Illinois</b>	)	
<b>municipal corporation,</b>	)	
	)	
<b>Respondent.</b>	)	

**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) (2012), 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) (2012). In support of this motion, Complainant states as follows:

1. A Complaint and Stipulation and Proposal for Settlement are being filed simultaneously 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) (2012).

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) (2012).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS  
LISA MADIGAN  
ATTORNEY GENERAL

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

BY: s/Raymond Callery  
Raymond Callery , #6193579  
Environmental Bureau  
Assistant Attorney General  
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[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)

Dated: March 5, 2018.