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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

APR 15 2003

KEITH RUNYON

STATE OF ILLINOIS
Pollution Control Board

Petitioner,

v.

PCB 03-135

(Third-Party Pollution Control
Facility Siting Appeal)COUNTY OF KANKAKEE, COUNTY
BOARD OF KANKAKEE, AND WASTE
MANAGEMENT OF ILLINOISConsolidated with PCB 03-125, 03
133, 03-134**KEITH RUNYON'S RESPONSE WASTE MANAGEMENT OF ILLINOIS
OBJECTIONS TO HIS INTERROGATORIES. Supplement.**

Petitioner inadvertently omitted sending copy of letter From Lee Eddleman of Waste Management, with this expanded response to the WMII objections to Keith Runyons Interrogatories. A copy of the letter which was originally submitted on April 10, 2003.

With the exception WMII's reply to Interrogatory No. 1. Its replies to Runyon's Interrogatories numbered (2) two through(9)nine are non-responsive.

All Interrogatories are appropriate to discover the communications, as defined in Runyon's Interrogatory petition, consistent with his filing which alleges that The County and Waste Management failed to comply with the County's Solid Waste Management plan and discovery of the complete information relating to the Public Comment statements entered into the Record by Lee Eddleman of Waste Management, on January 6, 2003 at approximately 1:54 P.M. and filed with the Kankakee County Clerk at the Office of the County Clerk. A copy of said document is attached.

Waste Management opened this avenue to discovery by its filing of said Statement in the Public Comment period at such a time as to provide no opportunity for discovery or cross examination.

PC #5 #030106-10

FILED



03 JAN -6 PM 1:54

Bruce Clark
COUNTY CLERK
KANKAKEE COUNTY**WASTE MANAGEMENT**Chicago Market Area
720 E. Butterfield Road
Lombard, IL 60148
(630) 572-8800
(630) 218-1711 Fax

January 6, 2003

Mr. Bruce Clark
County Clerk
County of Kankakee
189 East Court Street
Kankakee, Illinois 60901

Dear Mr. Clark:

Waste Management of Illinois, Inc. would like to take this opportunity to stipulate the following information regarding contact with property owners surrounding the present Kankakee County landfill and our proposed expansion of that site. During the recent public hearings on the expansion of this facility, Attorney Kenneth Bleyer stated that Waste Management had made no effort to communicate with area homeowners to inform them of our expansion plans and offer them a forum for citizen input. This assertion belies the facts of this matter and I offer the following information to refute this erroneous allegation.

My initial communication efforts began in March of 2000 due to discussions with the Hamilton family regarding reinstating property options on parcels they owned adjacent to the present Kankakee County landfill. Those exploratory discussions were initiated with the Hamilton's attorney, David Jaffe. In 2001, those option discussions were expanded to include other substantial properties owned by Mrs. Mehrer, Mr. Watson, Mrs. Dwan (Agro Farm Management), Mr. Fager and Mr. Flageole. In addition, discussions with individual single-family homeowners and commercial enterprises were begun in April of 2001 and continue until this day. More specifically, every single family domicile within 1,500 feet of the proposed expansion has received notice of our intent to provide real estate and well water protection guarantees if we are successful in permitting the expansion of the existing site. I also offer the following information to substantiate my efforts regarding communication with our neighbors, residents of Otto Township and citizens of Kankakee County:

- I have had personal conversations with the majority of the homeowners on the periphery of the proposed expansion. (Please see the attached partial list of those contacts.)
- On or about January 15, 2002, I conducted an evening informational presentation for all of the property owners on 7500 South Rd. and 1000 East Road at the home of Mike and Elese Smith. Seven neighboring families were in attendance.



Ruby Sparenberg	875 E. 6000 S. Road Chebanse, IL 60922
Mrs. Mehrer	487 W. Chebanse Avenue Chebanse, IL 60922
Todd Benjamin	768 E. 6000 S. Road Chebanse, IL 60922
E. Ray Stanley	6563-A S. Rt. 45-52 Chebanse, IL 60922
Agro Farm Management	P.O. Box 335 Osage, IA 50461
Cliff Schroeder	6725 S. Rt. 45-52 Chebanse, IL 60922
Carlos Cooley	1250 North Convent Bourbonnais, IL 60914
Leland Milk	6930 S. Rt. 45-52 Chebanse, IL 60922
Elmer Fager	3304 West 6000 S. Road Chebanse, IL 60922
Joseph Culkin	7426 S. Rt. 45-52 Chebanse, IL 60922
Albert Cote	271 E. 7500 S. Road Chebanse, IL 60922
Doug Flageole	427 E. 7500 S. Road Chebanse, IL 60922
Edwin Hamilton	P.O. Box 426 Bourbonnais, IL 60914
Pat Buescher	600 E. 7500 South Road Chebanse, IL 60922
Don & Diane Macaluso	E. 7500 South Road & 1000 East Road
Mike & Elese Smith	E. 7500 South Road & 1000 East Road



- Waste Management held an open house reception/presentation/tour at the Kankakee County landfill on June 13, 2002 for all of our neighbors surrounding the landfill and the proposed expansion. Thirty individuals attended this event. (Please see the attached photographs.)
- Waste Management sponsored a Fall Festival picnic for residents of Otto on November 2, 2002 at Rose Perkins home. Fifty adults and children attended the event as well as the Otto Township Fire Department.
- I personally conducted three tours of the facility for Otto Township and the Chebanse school system in 2002.
- Waste Management has paid for advertisements in the Kankakee Daily Journal and the Herald newspapers explaining our intentions to expand the site. Also, our expansion efforts have been the topic of countless newspaper articles since 2001.
- I have conducted numerous interviews with radio stations WKAN and WVLI to discuss this matter. We have also sponsored weather forecasts and salutations to local sports teams.
- We have made formal presentations to the Economic Development Council, the River Valley Forum, the Kankakee Chamber of Commerce and the Bradley/Bourbonnais Chamber of Commerce.
- We've met with the County Engineer's office, the Sheriff's Department, the County Health Department, the Otto Township Fire Department and the Township Highway Commissioner.
- We even participated in the Kankakee County 4H livestock auction and purchased an animal raised by Todd and Coleen Benjamin's son. The Benjamins are one of our neighbors at the existing landfill.

These statements are a true and accurate representation of Waste Management's efforts to inform and elicit comments from our neighbors and other interested parties throughout Kankakee County. I personally engaged in these conversations, made the presentations, conducted the open house, participated in the tours and formatted the advertisements that I have described. I am confident that Waste Management of Illinois, Inc. has made every possible effort to keep the community apprised of our intentions for this facility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lee Addleman'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lee Addleman
Vice President/Business Development
Waste Management of Illinois, Inc.

AFFIDAVIT OF SERVICE

The undersigned, pursuant to the provisions of Section 1-109 of the Illinois Code of Civil Procedure, hereby under penalty perjury under the laws of the United States of America, certifies that on April 14, 03 was served a copy of the foregoing was served upon via Facimile Transmission and by letter:

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Il 60601-3218

Attorney George Mueller
501 State Street
Ottawa, Il 61350
815 433 4705
Fax 815 422 4913

Donald J. Moran
Perterson & Houpt
161 North Clark Street, Suite 3100
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312 261 2149
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Elizabeth Harvey, Esq.
Swanson, Martin, & Bell
One IBM Plaza, Suite 2900
330 North Wabash
Chicago, Il 60611
312 321 9100
Fax 312 321 0990

Kenneth A Leshen
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815 933 3385
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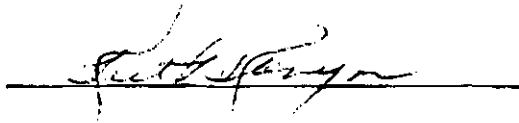
L. Patrick Power
956 North Fifth Avenue
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815 937 6937
Fax 937 0056

Jennifer J. Sackett Pohlenz
175 W. Jackson Boulevard
Suite 1600
Chicago, IL 60604
312 540 7540
Fax 312 540 0578

Kenneth A. Bleier
923 Gordon Terrace, #3
Chicago, IL 60613
773 348 4005
Fax 773 527 2873

Mr. Brad Halloran
Hearing Officer
Illinois Pollution Control Board
100 West Randolph, 11th Floor
Chicago, IL 60601
312 814 8917
Fax 814 3669

By depositing a copy thereof, enclosed in an envelope in the United States Mail at Rockford, Illinois, proper postage prepaid, before the hour of 5:00 P.M., addressed as above.

A handwritten signature in dark ink, appearing to read "Keith Runyon", is written over a horizontal line.

Keith Runyon
1165 Plum Creek Dr. Unit D.
Bourbonnais, IL 60914
815 937 9838