



April 9, 2015

Via Fedex Overnight Mail

Clerk
First District Appellate Court
160 North LaSalle St.
Chicago, IL 60601

Re: Petition for Review filing in *Natural Resources Defense Council et al.*
v. Illinois Environmental Protection Agency, et al.

Dear Clerk:

Enclosed please find for filing the following materials in connection with the above-captioned Petition for Review:

1. An original and 3 copies of the Petition, the Notice of Filing, and the Certificate of Service, for filing with the Court;
2. A check in the amount of \$25 for the docketing fee, and
3. An additional copy of the Petition, Notice of Filing, and Certificate of Service, together with a stamped self-addressed envelope so that you can return to me a file-stamped copy of these documents.

If you need to contact me concerning this filing, I can be reached at 312-651-7905, aalexander@nrdc.org.

Very truly yours,

Ann Alexander

NATURAL RESOURCES DEFENSE COUNCIL

cc: Albert Ettinger
Jessica Dexter
Matt Rota
Kim Knowles
Ronald M. Hill
Lisa Luhrs Draper
Ellen M. Avery
Thomas H. Shepherd
Stefanie Diers

**APPEAL TO THE APPELLATE COURT OF ILLINOIS
FIRST DISTRICT**

FROM THE ILLINOIS POLLUTION CONTROL BOARD

PRAIRIE RIVERS NETWORK,)	
NATURAL RESOURCES DEFENSE)	
COUNCIL, SIERRA CLUB,)	
ENVIRONMENTAL LAW & POLICY)	Petition for Review of an
CENTER, FRIENDS OF THE CHICAGO)	Order of the Illinois Pollution
RIVER and GULF RESTORATION)	Control Board
NETWORK)	
)	
v.)	
)	
)	
)	
)	
)	
)	
)	
)	
ILLINOIS POLLUTION CONTROL BOARD,)	Pollution Control Board
a state agency, ILLINOIS ENVIRONMENTAL)	14-106, 107, 108
PROTECTION AGENCY, a state agency,)	
and METROPOLITAN WATER RECLAMATION)	
DISTRICT OF GREATER CHICAGO, a state)	
agency,)	
)	
Respondents.)	

NOTICE OF FILING OF PETITION FOR REVIEW

To:

Illinois Attorney General Lisa Madigan
100 West Randolph Street
Chicago, Illinois 60601
Attn: Thomas H. Shepherd

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Attn: Stefanie Diers

Illinois Pollution Control Board
Chairwoman Deanna Glosser
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

Ronald M. Hill
Lisa Luhrs Draper
Ellen M. Avery
Jorge T. Mihalopoulos
Metropolitan Water Reclamation District of Greater Chicago
100 E Erie St
Chicago, IL 60611

PLEASE TAKE NOTICE that on April 9, 2015, the undersigned filed the **Petition for Review and Certificate of Filing** of Prairie Rivers Network, Natural Resources Defense Council, Sierra Club, Environmental Law & Policy Center, Friends of the Chicago River, and Gulf Restoration Network with the Clerk of the Illinois Appellate Court, First District. A copy is hereby served upon you.



Albert Ettinger, IL Bar No. 3125045
53 W. Jackson, Suite 1664
Chicago, Illinois 60604
773 818 4825
Ettinger.Albert@gmail.com
Counsel for Sierra Club & Gulf
Restoration Network



Jessica Dexter, IL Bar. No. 6298340
Environmental Law & Policy Center
35 E. Wacker Dr. Suite 1600
Chicago, Illinois 60601
312-795-3747
jdexter@elpc.org
Counsel for Environmental Law & Policy
Center and Friends of the Chicago River



Kim Knowles, IL Bar No. 6303731
Prairie Rivers Network
1902 Fox Drive, Suite G
Champaign, IL 61820
217-344-2371
kknowles@prairierivers.org
Counsel for Prairie Rivers Network



Ann Alexander, IL Bar No. 6278919
Natural Resources Defense Council
20 N. Wacker Drive Suite 1600
Chicago, IL 60606
312-651-7905
aalexander@nrdc.org
Counsel for Natural Resources Defense
Council

**APPEAL TO THE APPELLATE COURT OF ILLINOIS
FIRST DISTRICT**

FROM THE ILLINOIS POLLUTION CONTROL BOARD

PRAIRIE RIVERS NETWORK,)	
NATURAL RESOURCES DEFENSE)	
COUNCIL, SIERRA CLUB,)	
ENVIRONMENTAL LAW & POLICY)	
CENTER, FRIENDS OF THE CHICAGO)	
RIVER and GULF RESTORATION)	
NETWORK)	
)	
v.)	
)	
)	
)	
)	
)	
)	
)	
ILLINOIS POLLUTION CONTROL BOARD,)	Pollution Control Board
a state agency, ILLINOIS ENVIRONMENTAL)	14-106, 107, 108
PROTECTION AGENCY, a state agency,)	
and METROPOLITAN WATER RECLAMATION)	
DISTRICT OF GREATER CHICAGO, a state)	
agency,)	
)	
Respondents.)	

**PETITION FOR REVIEW OF AN ORDER OF THE ILLINOIS
POLLUTION CONTROL BOARD, DOCKET NOS. 14-106, 107, AND 108**

Petitioners Prairie Rivers Network, Natural Resources Defense Council, Sierra Club, Environmental Law & Policy Center, Friends of the Chicago River, and Gulf Restoration Network hereby petition the Court for review of the final order of the Illinois Pollution Control Board (Board), and denial of Petitioners’ Motion for Reconsideration, on cross-motions for summary judgment concerning issues raised in Petitioners’ appeal of the National Pollutant Discharge Elimination System permits issued by Respondent Illinois Environmental Protection Agency to Respondent Metropolitan Water Reclamation District of Greater Chicago (MWRD) for the O’Brien, Stickney, and Calumet water reclamation plants, all located in Cook County.

Petitioners appeal from the December 18, 2014 order of the Board granting Respondents' motion for summary judgment and denying Petitioners' motion for summary judgment, and the Board's March 5, 2015 order denying Petitioners' timely filed motion for reconsideration.

Petitioners respectfully submit that the Board's orders are clearly erroneous and against the manifest weight of the evidence. By this Petition, Petitioners will request that the Appellate Court reverse the Board's orders with direction that the subject permits be remanded to Respondent Illinois Environmental Protection Agency, and further relief as the Appellate Court may deem proper.



Albert Ettinger, IL Bar No. 3125045
53 W. Jackson, Suite 1664
Chicago, Illinois 60604
773 818 4825
Ettinger.Albert@gmail.com
Counsel for Sierra Club & Gulf
Restoration Network



Jessica Dexter, IL Bar. No. 6298340
Environmental Law & Policy Center
35 E. Wacker Dr. Suite 1600
Chicago, Illinois 60601
312-795-3747
jdexter@elpc.org
Counsel for Environmental Law & Policy
Center and Friends of the Chicago River



Kim Knowles, IL Bar No.6303731
Prairie Rivers Network
1902 Fox Drive, Suite G
Champaign, IL 61820
217-344-2371
kknowles@prairierivers.org
Counsel for Prairie Rivers Network



Ann Alexander, IL Bar No. 6278919
Natural Resources Defense Council
20 North Wacker Drive Suite 1600
Chicago, IL 60606
312-651-7905
aalexander@nrdc.org
Counsel for Natural Resources Defense
Council

CERTIFICATE OF FILING

I, Ann Alexander, an attorney, state that on April 9, 2015, I filed the accompanying **Notice of Filing** and **Petition for Review** by enclosing it in an envelope, addressed to the First District Appellate Court, 160 North LaSalle St., Chicago, IL 60601, and delivering it to a Fedex courier for delivery April 10, 2015, together with payment for such delivery.

A handwritten signature in blue ink that reads "Ann Alexander". The signature is written in a cursive style.

Ann Alexander, IL Bar No. 6278919
Natural Resources Defense Council
20 North Wacker Drive, Suite 1600
Chicago, IL 60606
Tel: (312) 651-7905