BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)	
JOHNS MANVILLE, a Delaware corporation,)	
Complainant,)	PCB No. 14-3
v.)	
ILLINOIS DEPARTMENT OF)	
TRANSPORTATION,)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on November 14, 2019, I caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, *Complainant's Motion For Interlocutory Appeal and Interlocutory Appeal Of Hearing Officer's Order Denying Complainant's Motion to Exclude Base Maps and Related Figures and Testimony at Hearing*, a copy of which is attached hereto and herewith served upon you via e-mail. Paper hardcopies of this filing will be made available upon request.

Dated: November 14, 2019 Respectfully submitted,

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COMPLAINANT JOHNS MANVILLE'S MOTION FOR INTERLOCUTORY APPEAL AND INTERLOCUTORY APPEAL OF HEARING OFFICER'S ORDER DENYING COMPLAINANTS' MOTION TO EXCLUDE BASE MAPS AND RELATED FIGURES AND TESTIMONY AT HEARING

Complainant Johns Manville ("JM"), by its undersigned counsel, submits to the Illinois Pollution Control Board ("Board"), pursuant to 35 Ill. Admin. Code 101.518 and Illinois Rules of Evidence 702 and 703, this Motion for Interlocutory Appeal and Interlocutory Appeal of Hearing Officer's Order Denying Complainant's Motion to Exclude Base Maps and Figures and Related Testing at Hearing ("Motion to Exclude," attached hereto as **Exhibit 1**). In support of its Motion and Appeal, JM submits its Memorandum in Support and states as follows:

1) On September 13, 2019, consistent with the Hearing Officer's operative scheduling Order of August 20, 2019, JM timely filed its Motion to Exclude. Specifically, JM requested that Respondent Illinois Department of Transportation ("IDOT") be barred from introducing any evidence, testimony, or exhibits/figures related to or premised on "Base Maps" and related "Figures" contained in the Reports of IDOT's purported expert, Mr. Steven Gobelman. JM argued that exclusion was warranted on the grounds that: (1) Mr. Gobelman admitted to creating the base maps and figures at issue, yet also admitted to lacking the requisite

expertise to do so; (2) the Base Maps and Figures were inaccurate, conflicted with the maps relied upon by the Board during the first Hearing in this case, and lacked adequate foundation as they were not the product of well-established scientific standards and/or sources of the type reasonably relied upon by experts in the field; and (3) in the alternative, to the extent Mr. Gobelman relied in any way on the experience of his colleague, Mr. Michael Nguyen, to create his Base Maps and Figures, such reliance was unreasonable as Mr. Nguyen was untrustworthy with respect to validating any of Mr. Gobelman's work.

- 2) The Hearing Officer denied JM's Motion to Exclude on October 31, 2019. (Hearing Officer Order ("Order"), attached hereto as **Exhibit 2**, p. 7.)
- The Hearing Officer Order devotes merely two paragraphs to ruling on the merits of JM's 21-page Motion to Exclude (other than to summarize JM's arguments.) (*Id.*) The Hearing Officer summarily held that: (a) Mr. Gobelman possessed expertise to *use* the Base Maps and Figures; (b) the Base Maps and Figures do not lack foundation because Mr. Nguyen is experienced in AutoCAD; and (c) it was reasonable for Mr. Gobelman to rely on Mr. Nguyen (*Id.*) There is scant analysis with respect to any of these findings. (*Id.*)
- 4) On November 1, 2019, JM filed a Motion to Cancel and Reschedule the Hearing set to begin November 19, 2019 in light of this Motion as well as a witness availability issue. Respondent, IDOT, did not oppose the Motion. On November 5, 2019, the Hearing Officer granted the Motion.
- 5) Board Rules provide that "[a] party may take to the Board an interlocutory appeal from a hearing officer ruling by filing a motion within 14 days after the party receives the hearing officer's order." 35 Ill. Admin. Code 101.518. JM has filed this Motion within 14 days

of receipt of the Ruling and thus has satisfied this requirement. *People v. Doren Poland Lloyd Yoho*, PCB 98-148, 2001 WL 179835, *1 (Feb. 15, 2001).

6) JM contends that IDOT waived certain arguments, the Hearing Officer misapplied the law and overlooked critical facts, and JM's Motion to Exclude should have been granted.

WHEREFORE, for the reasons stated herein, JM requests that the Board reverse the Hearing Officer Order (with respect to JM's Motion to Exclude) and grant JM's Motion to Exclude.

MEMORANDUM IN SUPPORT OF COMPLAINANT JOHNS MANVILLE'S MOTION FOR INTERLOCUTORY APPEAL AND INTERLOCUTORY APPEAL OF HEARING OFFICER'S ORDER DENYING COMPLAINANT'S MOTION TO EXCLUDE BASE MAPS AND FIGURES AND RELATED TESTIMONY AT HEARING

Background

After a five day Hearing in May and June 2016, the Board issued its Interim Opinion and Order ("Interim Opinion") finding that IDOT violated Sections 21(a), (d) and (e) of the Illinois Environmental Protection Act (the "Act") on property in Waukegan, Illinois (referred to as Site 3 and Site 6 or, together, the "Sites"), where JM was conducting a removal action pursuant to an Administrative Order on Consent with USEPA involving asbestos-containing material ("ACM"). The Board held that:

IDOT caused open dumping of ACM waste along the south side of Greenwood Avenue within Site 6 and adjacent areas along the north edge of Site 3. IDOT allows open dumping to continue as long as ACM waste remains at these locations. The Board further finds that IDOT allowed open dumping of ACM waste on the portion of Site 3 within Parcel 0393. The Board therefore finds that IDOT violated Section 21(a) of the Act. 415 ILCS 21(a) (2014). IDOT also violated Section 21(d) by conducting an unpermitted waste disposal operation [on Parcel 0393], and Section 21(e) by illegally disposing waste. 415 ILCS 5/21(d), (e) (2014).

(Interim Opinion, p. 22.)

In looking to fashion an appropriate remedy for JM, the Board weighed every equitable factor *against* IDOT and in favor of JM and ordered that IDOT must reimburse JM for certain cleanup costs JM had incurred "as a result of [IDOT]'s violations" at the Sites and to ensure fulfillment of the Act's stated purpose that "adverse effects on the environment are borne by those who cause them." (*Id.*, p. 21.) Needing a more fulsome record on cleanup costs, however, the Board directed the Hearing Officer to conduct a hearing for evidence on the following issues:

- 1. The cleanup work performed by JM in the portions of Site 3 and Site 6 where the Board found IDOT responsible for ACM waste present in soil.
- 2. The amount and reasonableness of JM's costs for this work.
- 3. The share of the JM's costs attributable to IDOT.

(*Id.*, p. 22.) The work accomplished to investigate the Sites and to implement the removal action is referred to herein as "Removal Work."

JM and IDOT filed Stipulations on August 13, 2019, agreeing to most of the first two issues, including the "amount and reasonableness" of the costs JM incurred to conduct the Removal Work on the Sites. JM and IDOT also agreed on how those costs should be allocated into 13 different work Task Buckets, which correspond with the major work tasks.¹

As a result, the ultimate issues remaining for the Board in the upcoming Hearing have been narrowed to "where the Board found IDOT responsible for ACM waste present in soil" and "the share of JM's costs attributable to IDOT." More specifically, what remains in dispute is: (1) the exact areas where JM did Removal Work ("Removal Areas"); (2) the areas where IDOT is responsible for ACM waste present in the soil ("IDOT Areas of Liability"); (3) the

4

The "Task Buckets" are: (1) Nicor Gas Line; (2) City of Waukegan Water Line; (3) AT&T; (4) Utility/ACM Soils Excavation; (5) Northeast Excavation; (6) North Shore Gas; (7) Dewatering; (8) Filling and Capping work; (9) Ramp Work; (10) General Site and Preparation Work; (11) Health and Safety; (12) USEPA Oversight; and (13) Costs for Legal/Legal Support Services (Manikas/Walker, Wilcox & Matousek). (Motion to Exclude, p. 4.) The appropriate costs were then allocated into each Task Bucket. (*Id.*)

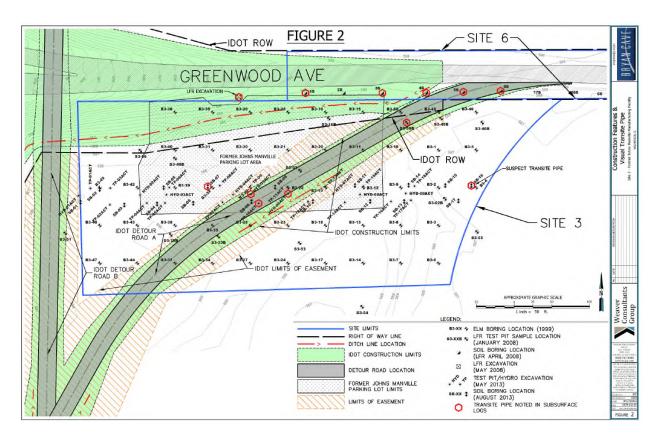
extent to which the Removal Areas are connected to the disputed IDOT Areas of Liability; and (4) the amount of the costs that should be *attributed* to IDOT (what JM refers to as "attribution opinions"). In other words, the Hearing will be focused, in large measure, on where features are located. Thus, in order to render a decision on these issues, the Board must be able to easily determine: the boundaries of Sites 3 and 6 and Parcel No. 0393; the location of various contaminated soil borings and test pits as well as the contaminated areas they represent; and the positioning of the Removal Areas (collectively, the "Key Features").

The Board's Interim Opinion did not find IDOT liable for all of Sites 3 or 6, but rather certain portions of both. (Interim Opinion, p. 13.) Critically, in deciding *exactly where IDOT violated the Act*, the Board analyzed and relied upon maps entered into the record as evidence without objection by either party (referred to hereafter as "Liability Maps"). (*See* Interim Opinion, p. 9 (relying on Exhibit 84 to determine IDOT liability for ACM waste from 1S-4S); *id.*, p. 10 (relying on Exhibit 16-18, Exhibit 06-28, and Exhibit 84 to determine IDOT liability for B3-25, B3-16 and B3-15); *id.*, p. 11-12 (stating that B3-45 appears to be on the border of Parcel No. 0393 based upon maps used at Hearing); *id.*, pp. 7-8 (relying on Exhibits 6-27 and 84 in discussing whether IDOT was liable for areas along Detour Road A and the intersection of Detour Road A and Greenwood Avenue).)² The Board needed to rely on these Liability Maps because they demarcated where soil borings and test pits had been taken, including those where ACM had been detected. For example, Exhibit 16-18, one of the Liability Maps used by the

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The Liability Maps were based upon information provided by the environmental consultant that was responsible for investigating and overseeing the remediation of the waste on the Sites (AECOM) and had been review and approved by USEPA. (*See e.g.*, Motion to Exclude, Exhibit J (Declaration of Douglas J. Dorgan, Jr.), ¶¶ 7, 8; Motion to Exclude, Exhibit L (Declaration of Affidavit of Dr. Tatsuji Ebihara), ¶¶ 3-4.)

Board, identifies Key Features, including soil boring/test pit locations where some of the ACM on the Site, Transite Pipe, was found in subsurface logs:



When identifying where IDOT was liable for violating the Act, the Board pointed to locations identified on the Liability Maps. For example, the Board held that IDOT was liable for ACM in the areas of 1S, 2S, 3S, 4S, B3-15, B3-16, B3-50, B3-25 and B3-45 to the extent it [boring B3-45] fell within Parcel No. 0393, which are all located near the northern border of Site 3 and the southern border of Site 6. (Interim Opinion, p. 13.)

Mr. Gobelman's Base Maps And Attribution Opinions

During the first Hearing in this case, Mr. Gobelman created and relied upon two exhibits, Exhibits 90 and 202, that contained the same layout and soil boring/test pit locations as the Liability Maps. (*See* Exhibits 90 (Motion to Exclude, Exhibit M) and 202 (Motion to Exclude,

Exhibit N).) But when it came to damages, he changed course and, unlike Mr. Dorgan, no longer relied on the Liability Maps in forming his opinions. In fact, Mr. Gobelman went so far as to claim that the Liability Maps relied upon by the Board at the first Hearing, that Mr. Gobleman himself did not object to, were wrong. (Motion to Exclude, Exhibit O, p. 63:10-16 ("Q. Based upon your opinion in this report, your current report, you're saying that the maps the board was using to render its opinion were not accurate? A. If you're utilizing my base map, then yes, those maps would -- I would have deemed them as being inaccurate.").) In lieu of using the Liability Maps that all parties agreed to in the first Hearing, Mr. Gobelman created his own Base Map and Figures from scratch, which he compiled from several different source maps. (Motion to Exclude, Exhibit D ("Gobelman Initial Report,"), pp. 3-5.) He then created Figures, premised on his Base Map, identifying areas where he believed IDOT was liable for damages. (*Id.* at Figures 2-8.) He used these Figures to reach his attribution opinion. More specifically, he measured the distances between borings/test pits or measured the square footage encompassing areas around certain borings and test pits to determine the costs attributable to IDOT. (*Id.*, pp. 6-17.)

For example, Mr. Gobelman measured the distance between where he plotted certain Site 3 and Site 6 borings on his Figures to determine IDOT's attribution for the AT&T lines Task Bucket and he measured the square footage of areas around where he plotted other borings to determine IDOT's attributions for NorthShore Gas Line and Northeast Excavation area Task Buckets. (*Id.*, pp 9-11.) He later amended his initial Base Map and Figures to create a second Base Map and supplemental Figures through a Supplemental Report to correct some inaccuracies pointed out to him by Mr. Dorgan³ (collectively, "Base Maps and Figures"), but

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By correcting his Site boundaries, Mr. Gobelman conceded that the reason for creating the Base Map in the first place – his belief that the Site 3 boundaries from various documents, including AECOM's Final Site Survey, did not line up – was wrong. (Motion to Exclude, Exhibit D, pp. 3-4.) In his Supplemental Report, his Site 3

continued to employ the same measuring technique to determine his IDOT attribution opinions. (Motion to Exclude, Exhibit F ("Gobelman Supplemental Report"), pp. 2-3.) Because the location of the soil borings/test pits and other Key Features on his Base Maps and Figures serve as the foundation for his IDOT attribution opinions, when he changed the location of these Key Features in his Supplemental Report Base Maps and Figures, he had to recalculate all of his measurements and his corresponding IDOT cost attributions. (*See id.*, pp. 1-7 and Figures 1-8.) Thus, his overall IDOT attribution increased from \$489,891 to \$600,050, underscoring the direct relationship between the accuracy of his Base Maps and Figures and the accuracy of his IDOT attributions. (*Id.*, pp. 7-8.)

Argument

JM made three independent arguments in support of its Motion to Exclude pursuant to Illinois Rules of Evidence 702 and 703. As to each, the Hearing Officer misapplied the law, misinterpreted some of JM's arguments and/or ignored significant facts. The Board should hear this Appeal and reverse.

I. <u>The Hearing Officer Erred in Denying JM's Motion to Exclude To the Extent Based</u> on Mr. Gobelman's Lack of Expertise to *Create* the Base Maps.

A. IDOT Has Waived Opposition to JM's Expertise Objection.

JM argued in its Motion to Exclude that Mr. Gobelman lacked the expertise *to create* his Base Maps. (Motion to Exclude, pp. 9-11.) In "IDOT's Response to Complainant's Motion to Exclude Base Maps and Related Figure and Testimony at Hearing," filed October 4, 2019 (hereinafter referred to as the "IDOT Opposition"), IDOT utterly fails to address this argument. Instead, IDOT discussed only Mr. Gobelman's experience reviewing Highway Authority

boundaries generally line up with the boundaries identified by AECOM, the company that actually defined the boundaries. (Motion to Exclude, Exhibit G ("Dorgan Supplemental Report"), at Figure 1A.)

Agreements and apportioning costs in connection with construction projects associated with Highway Authority Agreements. (IDOT Opposition, pp. 13-14.) This is a red-herring; evaluating costs on highway authority agreements has no connection or relevance to the creation of environmental base maps. Nor does any purported expertise with "economic considerations of remediation projects" (*id.*, p. 14; Order, p. 7) have any bearing on map creation. IDOT has therefore waived any opposition to JM's Rule 702 arguments by failing to oppose them. 35 Ill. Admin. Code 101.500(d).

B. The Hearing Officer Misinterpreted JM's Argument.

Like IDOT, other than acknowledging JM's argument, the Hearing Officer's Order does not dig into JM's contention that Mr. Gobelman lacks the expertise and qualification to create his Base Maps and Figures.

Here, he focused on a different issue, holding that:

Applying the same standard and reasoning used in my ruling regarding the testimony of Mr. Dorgan, I find that Mr. Gobelman has the requisite expertise *to use Base Maps to determine areas of liability* instead of reports and maps generated by AECOM. As IDOT notes, and I have observed, Mr. Gobelman has vast experience in dealing with remediation and economic considerations.

(Order, p. 7 (emphasis added).) However, JM did not argue that Mr. Gobelman lacked the expertise to *use* such maps. Rather, Mr. Gobelman lacks the expertise to have created them. Using Base Maps and creating Base Maps are obviously two entirely different tasks. While "dealing with remediation and economic considerations" may be relevant to the former task, it has no bearing on the latter. Consequently, the Hearing Officer's Order must be overturned.

C. Mr. Gobelman Should be Barred Under Rule Illinois Rule of Evidence 702.

Had the Hearing Officer focused on Mr. Gobelman's lack of expertise to create the Base Maps and Figures, it would have been apparent that exclusion of the Base Maps and Figures and

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related testimony is warranted under the applicable Illinois Rules of Evidence. Illinois Rule of Evidence 702 provides:

If scientific, factual, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise.

Mr. Gobelman has repeatedly claimed that *he* created the Base Map and Figures. He says in the Gobelman Initial Report:

I had to create a base map (Gobelman: Figure 1) locating Sites 3 and 6, as well as the location of the IPCB referenced soil sampling locations and areas remediated. My review of the various figures showing the location of Sites 3 and 6 revealed the locations of Sites 3 and 6 were not consistently located on the various figures.

(Motion to Exclude, Exhibit D, p. 3; see also id., p. 4 ("I created a site map . . .").) In the Gobelman Initial Report, Gobelman explains each step he took and how he used seven different source maps to create his Base Map. (Id., pp. 3-5.) Indeed, Mr. Gobelman details how he measured distances through scaling off of PDFs to locate Key Features on his Base Maps. (Id.) Likewise, in an Affidavit he signed, Mr. Gobelman discussed the Base Map "I created." (See IDOT's Response to Motion to Complainant's Motion for Sanctions, filed December 12, 2018, Exhibit A, attached hereto as Exhibit 3, ¶¶ 2, 3.) IDOT has also identified Mr. Gobelman as the creator of the Base Maps. (IDOT Opposition, pp. 14-15 (arguing that it was "entirely reasonable for Mr. Gobelman to create his own Base Maps").)

While it is true that Mr. Nguyen, who is a CAD manager, actually plotted the lines and dots on the Base Maps using AutoCAD software (Motion to Exclude, Exhibit Q, p. 13:5-19), it is undisputed that Mr. Nguyen had no input with respect to where to place those lines and dots or other integral parts of creating a Base Map, such as source selection. Mr. Gobelman performed these important functions alone. (Motion to Exclude, Exhibit P, p. 25:3-8 (Mr. Nguyen

testifying that Mr. Gobelman provided the source materials), p. 26:19-23 (Mr. Nguyen testifying that "whatever the project manager provides to me what to use, I'm using. I don't have, like, saying, No, don't use this, don't use that"), p. 58:4-13 (in responding to how he knew where to locate the Northeast Excavation, a Key Feature, Mr. Nguyen testifying: "Again, if -- from the information Mr. Gobelman gave me. Q. So he would just tell you "put it here," and you'd put it there? A. Yes."), p. 73:4-10 (when asked if he "would make any changes on his own," Mr. Nguyen testifying, "No, no, I have other things to do. I'm not – no, no no. For the record, no").)

When asked why a change in the location of Parcel No. 0393 required him to move the northern boundary of Site 3 on the Base Map, Mr. Nguyen testified: "I don't know. I'm not the decision maker on why I moved that thing." (Motion to Exclude, Exhibit P, p. 68:3-15.) Mr. Nguyen went so far as to say that he would place Key Features where Mr. Gobelman wanted them placed even if he thought Mr. Gobelman was wrong about their location:

- Q: If he wanted you to move something that you disagreed with, would you tell him that or would you just move it?
- A: If he tell me to move it, I'd move it.

(*Id.*, p. 67:16-20.)

In essence, Mr. Nguyen did what Mr. Gobelman asked without question. Thus, Mr. Gobelman must be considered the creator of the Base Maps and Figures and his qualifications, not Mr. Nguyen's qualifications, are what should be at issue.

Mr. Gobelman lacked the experience to make the important decisions necessary to create the Base Maps and Figures. This included the functions of selecting reliable and consistent sources and locating Key Features on the Base Map and Figures. Mr. Gobelman readily concedes that he is not an expert in creating Base Maps. (Motion to Exclude, Exhibit O, pp. 60:20-61:1 ("Q. Have you ever attempted to create your own map to delineate features and

boundaries on a property when USEPA has already approved a map where those features and boundaries have been placed? A. No."), *id.*, p. 96:6-12 (Gobelman testifying that he does not consider himself an expert in plotting property boundaries based on legal descriptions), *id.*, p. 18:2-16 (Gobelman identifying his AutoCAD experience as having "played" with AutoCAD drawings, as "minimal," and as limited to "simple stuff and admitting he has no experience in creating surveys); Motion to Exclude, Exhibit Q, p. 13:5-19 (Gobelman admitting he lacks the expertise to make changes to his Base Map).) When asked what expertise he was relying on in offering his opinions, Mr. Gobelman irrelevantly identified only his "experience in dealing with evaluating costs on highway authority agreements that I have done dealing with my work with EPA." (Motion to Exclude, Exhibit O, p. 15:18-22.)

Indeed, it is Mr. Gobelman's lack of experience that led him to create flawed Base Maps that cannot possibly assist the Board as is required by Illinois Rule of Evidence 702. Without the expertise in creating base maps, plotting surveys or using the AutoCAD program, Mr. Gobelman had, and continues to have, no way to put Base Maps together properly, let alone verify whether they are accurate. Exclusion of the Base Maps and related Figures/testimony is warranted.

II. <u>The Hearing Officer Erred in Denying JM's Motion to Exclude Based on Foundation.</u>

A. IDOT Has Waived Opposition to Much of JM's Foundational Objection.

JM made a number of arguments supporting its claim that Mr. Gobelman's Base Maps and Figures lacked foundation. (Motion to Exclude, pp. 11-18.) For example, JM argued: (1) that the Base Maps and Figures were unsupported and, in fact, were contradicted by the record; (2) that Mr. Gobelman failed to correctly use and implement accepted methods for creating base maps; and (3) that Mr. Gobelman relied on sources not reasonably relied upon expert's in his

field in creating the Base Maps and Figures, including that he: (a) used inconsistent sources to build his Base Map and Figures and (b) employed unreliable sources to create his Base Maps and Figures. IDOT responded only to JM's arguments regarding the information Mr. Gobelman relied upon set forth in Section (3) above. As a result, IDOT has waived any opposition to the remaining foundational arguments. 35 Ill. Admin. Code 101.500(d).

B. The Hearing Officer Misapplied the Law in Ruling on JM's Foundational Arguments.

The Hearing Officer Order lacks any analysis of JM's arguments, merely stating:

Mr. Nguyen's 17 years' experience working for Andrews Engineering as a CAD drafter satisfies any foundation issues.

(Order, p. 7.) Mr. Nguyen's experience as an AutoCAD drafter has nothing to do with whether Mr. Gobelman created accurate Base Maps and Figures, whether the methods used to create them were applied properly by Mr. Gobelman (or even Mr. Nguyen), or whether Mr. Gobelman selected information reasonably relied upon by experts in his field to create the Base Maps and Figures. And Mr. Nguyen's expertise is entirely unrelated to the question of whether Mr. Gobelman's Base Maps and Figures conflict with the Liability Maps used at the liability stage.

Expertise and foundation are separate inquires governed by two different rules, Rules 702 and 703 of the Illinois Rules of Evidence. *See e.g., People v. Simmons*, 2016 IL App (1st) 131300, ¶ 115 (finding that an expert must both be qualified under Rule 702 and that his or her testimony must have an "adequate foundation establishing that the information on which the expert bases her opinion is reliable" as required by Illinois law and Rule 703). A person might possess significant experience and still use or implement a methodology incorrectly. Yet the Hearing Officer incorrectly ruled that Mr. Nguyen's expertise eradicated all foundational issues, entirely missing the point.

C. JM's Motion Should Have Been Granted.

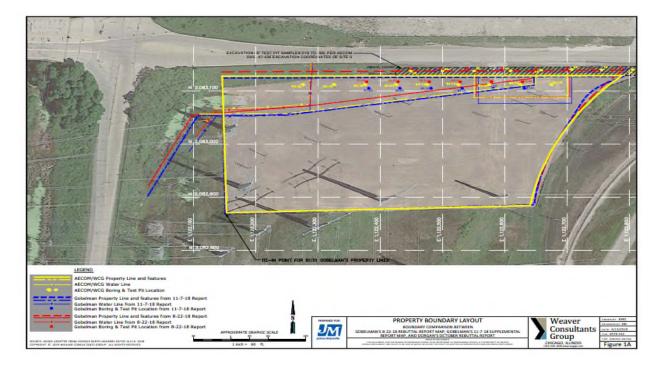
Here, if the Hearing Officer had correctly applied the law, he would have realized that Rule 703 requires the exclusion of the Base Maps, Figures and related testimony. The Rule provides that "[f]or expert testimony to be admissible, an adequate foundation must be laid establishing that the information that the expert bases the opinion upon is reliable." *Taylor v. Cnty. of Cook*, 2011 IL App (1st) 093085, ¶ 32; *Kruzek v. Estate of Kruzek*, 2012 IL App (1st) 121239-U, ¶ 31 (limiting testimony based on lack of reliable foundation); ILL. R. EVID. 703. It is the burden of *the proponent* of expert testimony to lay this foundation. *People v. Safford*, 392 III. App. 3d 212, 221 (III. App. Ct. 2009) (trial court erred when it allowed proposed expert examiner to testify to conclusions without providing evidentiary foundation for his opinion).

1. The Base Maps and Figures Lack Foundation as they are Inaccurate and Contradicted by Facts in the Record.

"An expert is only as valid as the basis and reasons for the opinion . . . Expert opinions based on guess, speculation or conjecture are inadmissible." *Torres v. Midwest Dev. Co.*, 383 Ill. App. 3d 20, 28-29 (Ill. App. Ct. 2008) (barring opinion because it lacked a sufficient factual basis); *Todd W. Musburger., Ltd. v. Meier*, 394 Ill. App. 3d 781, 802 (Ill. App. Ct. 2009) (court did not abuse discretion in barring opinion testimony that was contradicted by facts in the record).

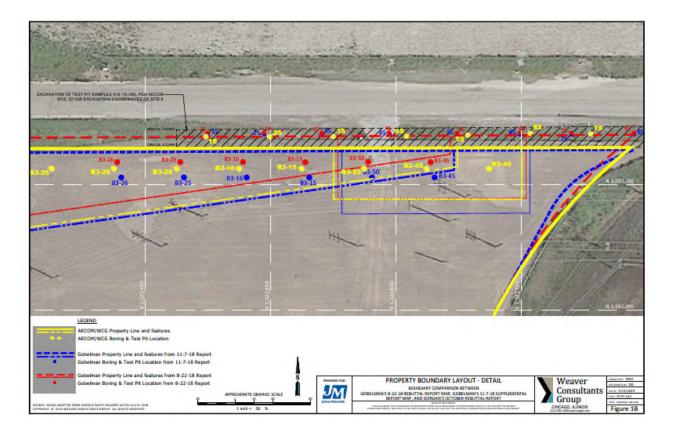
Mr. Gobelman's opinions are all based upon his Base Maps and related Figures, which are both inaccurate and inconsistent with the Liability Maps and thus lack foundation. The problem stems from, among other things, Mr. Gobelman's failure to select and use consistent and reliable sources and to accurately plot Key Features for his Base Maps and Figures. For instance, Mr. Gobelman moved the soil borings and test pits from their original locations on the Liability Maps to new locations on his Base Maps and Figures. (Motion to Exclude, Exhibit G,

at Figures 1A and 1B.) These Figures show not only that Mr. Gobelman's new boring locations are in the wrong place, but also demonstrate that when Mr. Gobelman amended his Base Maps and Figures in his Supplemental Report, he shifted certain Key Features both to the south *and to the east*, namely the Northeast Excavation⁴ and the Site 3 borings. IDOT does not dispute that Mr. Gobelman made these modifications and offers no reasoning or justification for these significant changes, which conflict with the factual record. (Motion to Exclude, Exhibit G, Figures 1A, 1B (comparing Gobelman's red lines and dots to his blue line and dots).) These Figures are set forth below:



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Mr. Nguyen testified that Mr. Gobelman directed him where to place the Northeast Excavation on the Base Maps and Figures. (Motion to Exclude, Exhibit P, p. 58:4-13.)



These inaccuracies translate into multiple problems with Mr. Gobelman's opinions and the evidentiary record. As discussed above, unlike Mr. Dorgan, Mr. Gobelman relied upon linear or square footage measurements taken from his Base Maps and Figures to determine most, if not all, of his IDOT attributions. (Motion to Exclude, Exhibit D, pp. 6-17 and Figures 2-8; Motion to Exclude, Exhibit F, pp. 1-8 and Figures 2-8.) The accuracy of and foundation for his Base Maps and Figures thus are of paramount importance to Mr. Gobelman's attribution opinions. Because of this, even the slightest mistake in these Base Maps and Figures impacts his opinions' validity. As an example, Mr. Gobelman used square feet to determine the portion of costs incurred to remediate Northeast Excavation that are attributable to IDOT and used linear feet tied to Site 3 and 6 boring locations to perform this analysis for attribution of AT&T-related costs. (See e.g., Motion to Exclude, Exhibit F, pp. 1-3.) Because the location and size of the

Northeast Excavation is wrong and the location of the Site 3 and 6 borings are wrong in his Supplemental Base Map, Mr. Gobelman's attributions cannot possibly be correct.

In short, IDOT is asking the Board to rely on evidence not supported by facts in the record and evidence that contradicts evidence it previously relied upon to identify where IDOT was liable. To do so would call into question the veracity of either the Board's Interim Opinion or its opinion on damages. The Board should not allow Mr. Gobelman to introduce evidence that conflicts with the established record, which will only confuse the record. *Torres*, 383 Ill. App. at 28-29 (expert opinions excluded when they lacked a "factual basis").

2. The Base Maps Lack Foundation Because their Creation Did Not Rely on and/or Follow Appropriate, Applicable Standards.

"Where an expert's opinion is based upon improper elements, his testimony is incompetent and may be excluded or stricken upon a proper motion." *City of Chi. Dep't of Transp. v. Bouy*, 69 Ill. App. 3d 29, 38 (Ill. App. Ct. 1979) (upholding exclusion of expert testimony that was based upon "an improper application of the income method of appraisal"); *People v. McKown*, 236 Ill. 2d 278, 310-11 (Ill. 2010) (finding reversible error when the person performing the test upon which the scientific testimony was based "failed to perform the test in compliance with" the applicable standards and thus the testimony lacked a "proper foundation"). Stated differently, expert opinions lack foundation when the expert makes obvious mistakes in applying a methodology or in reaching an opinion. *People v. Thill*, 297 Ill. App. 3d 7, 13 (Ill. App. Ct. 1998) ("Given these serious flaws in the basis for [the expert]'s opinion, we find that the trial court erred in failing to strike [the expert]'s opinion."). There is no dispute this is the standard applicable to JM's Motion to Exclude. (IDOT Opposition, pp. 12-13.)

Yet Mr. Gobelman made a number of mistakes in applying base map-making methodology, leading to inaccurate Base Maps and Figures. As a result, exclusion of his exhibits and testimony is warranted.

Both Mr. Gobelman and Mr. Nguyen concede that, to create an accurate Base Map, the sources for such a map must be consistent:

Q: Do these documents need to be consistent in order for the map to be accurate?

A: You mean line up?

Q: Yeah.

A: Yes, it has to be lined up, yes, consistent.

(Motion to Exclude, Exhibit P, p. 29:2-8 (Nguyen testimony regarding sources for AutoCAD drawing.)

Q: What's the reference that you -- Well, you would agree you need to have a similar reference point in order to compare different maps --

A: Mm-hmm.

Q: -- right? Okay.

THE COURT REPORTER: Is that a yes?

THE WITNESS: Yes. Sorry.

(Motion to Exclude, Exhibit O, p. 85:1-8 (Gobelman testimony regarding use of common point of reference in comparing maps); *see also* Motion to Exclude, Exhibit Q, p. 32:7-12 (Gobelman testimony).)

Notwithstanding their recognition that sources must be consistent, both Mr. Gobelman and Mr. Nguyen admit that the Base Maps were put together with inconsistent sources and/or sources that lacked a common reference point.⁵ Mr. Gobelman's Initial and Supplemental

Mr. Gobelman claims to have used the following sources for his Base Maps: (1) a Google 2018 image of Site 3 "showing the fencing around Site 3" to demarcate Site 3; (2) the legal description from the Grant of Public Highway dated August 3, 1971 for the "location of Parcel 0393" (Hearing Ex. 41-1); (3) a draft ELM map for certain "soil sampling locations" on Site 3 (Hearing Ex. 57-536); (4) AECOM's Work Plan Rev. 2, March 13, 2014, Sheet C-0022 (Hearing Ex. 66-99) for sampling locations 1S-9S on Site 6 and the Northeast Excavation; (5) the AECOM Final Site Survey (JM0040322) for the location of the Nicor Line, the North Shore Gas Line, and the City of Waukegan Water Line; (6) Dorgan Figure 1 for the AT&T lines; and (7) a Plat of Topographic Survey by Atwell

Reports contain Figures highlighting this exact point. (Motion to Exclude, Exhibit O, pp. 66:9-67:8 (discussing Ex-1 from Gobelman Initial Report, which purportedly shows that the Atwell survey, the AECOM Final Site Survey, and Mr. Dorgan's Figure 1 Site boundaries as being "inconsistent"); Motion to Exclude, Exhibit F, Gobelman Supplement Report at Ex-2 (showing Site 3 boundaries from various sources do not align, particularly in northwest corner).) Despite claiming that these Site boundaries were inconsistent, Mr. Gobelman admits to using these sources to create his Base Maps. (Motion to Exclude, Exhibit D, pp. 3-5.) It follows that, if the source boundaries are inconsistent, then the locations of the Key Features plotted within those source boundaries are likewise inconsistent. This renders the Base Map and Figures flawed and requires their exclusion.

Along the same lines, Mr. Gobelman failed to understand the fundamental principle of science that fixed features do not move in space, leading him to place certain Key Features in the wrong place. (Motion to Exclude, Exhibit F, p. 3.) In the Gobelman Supplemental Report, Mr. Gobelman moved the northern boundary of Site 3 *and* the location of the Waukegan Water Line more than 10 feet south. (Motion to Exclude, Exhibit Q, p. 40:2-20.) Mr. Gobelman attempted to explain his thinking as follows: "[e]verything is tied together, so if you move the northern boundary up ten feet, you're also moving the southern boundary up 10 feet. And everything associated within is locked in, so everything moves ten feet." (Motion to Exclude, Exhibit O, pp. 39:19-40:4.) This is incorrect and cannot logically be true.

The City of Waukegan Water Line is fixed in space and was geo-located on the AECOM Final Site Survey; put another way, its location is not dependent on an arbitrary property line

for Site boundaries. (Motion to Exclude, Exhibit D, pp. 4-5; Motion to Exclude, Exhibit O, pp. 69:19-71:5 (stating that he started with the assumption that the Atwell Survey was correct and used it for "easterns and northerns").) With the exception of an updated Google Aerial photo, the same sources were used for both the Gobelman Initial Report and Gobelman Supplemental Report.

19

demarcation. Thus, it was improper for Mr. Gobelman to move its location. Accordingly, the location of the City of Waukegan Water Line on the Base Maps do not match with its location on any other maps, including the AECOM Final Site Survey. (*See* Motion to Exclude, Exhibit G, Figure 1A, *supra*, p. 15 (compare AECOM yellow water line to Gobelman blue water line).) Mr. Gobelman's failure to recognize that the movement of the northern boundary of Site 3 did not require the movement of the City of Waukegan Water Line, which was geo-located in space, renders the Base Maps and Figures (and any testimony and Mr. Gobelman's opinions therefrom) unreliable. Exclusion, therefore, is warranted.

Mr. Gobelman failed to follow his own rule that one must use consistent sources with common points of reference in order to create an accurate Base Map as well as the general principle of science that features on a map that are fixed in space, such as a utility, do not move when it is discovered that a Site boundary was misplaced. Consequently, Mr. Gobelman's Base Maps and Figures should not be received into evidence. A tribunal "is not required to blindly accept the expert's assertion that his testimony has an adequate foundation. Rather, the trial court must look behind the expert's conclusion and analyze the adequacy of the foundation." *Soto v. Gaytan*, 313 Ill. App. 3d 137, 146 (Ill. App. Ct. 2000).

- 3. The Base Maps Lack Foundation Because they were Created with Information Not Reasonably Relied upon By Experts in the Environmental Field.
 - a. Mr. Gobelman Failed to Consistently Rely on Data from the Environmental Consultant and Cherry-Picked Information From Certain Sources.

To lay an adequate foundation for expert testimony, "it must be shown that the facts or data relied upon by the expert are of a type reasonably relied upon by [experts] in that particular field in forming opinions or inferences." *People v. Burhans*, 2016 IL App (3d) 140462, ¶ 30;

People v. Contreras, 246 Ill. App. 3d 502, 510 (Ill. App. Ct. 1993) (same). When creating a base map for environmental purposes, it is well-established that reliable sources of information originate with the entity that conducted the underlying environmental work, especially if that work has been accepted by a regulatory agency. (Motion to Exclude, Exhibit J, ¶ 6.) This is why Mr. Dorgan used AECOM's information to create his maps. (Motion to Exclude, Exhibit C (noting that "Site layout supplied by AECOM").) At the first Hearing, Mr. Gobelman did the same, creating Exhibits 90 and 202 that were based upon the same AECOM information as Mr. Dorgan's Map as well as the Liability Maps. (Motion to Exclude, Exhibit J, ¶ 8; Motion to Exclude, Exhibit O, pp. 55:22-56:5 (stating that he "just took the figures that were in the original map and modified them, not creating anything new but just modifying that original Dorgan's report's figures" when creating Exhibits 90 and 202).)

Nonetheless, during this phase of the case, Mr. Gobelman ignored much of this same AECOM information when creating his Base Maps and Figures. Instead, he used a jumble of PDFs that had been produced (some of which were drafts) in order to "locate" his Key Features, including the Site boundaries, on his Base Maps. (*Supra*, pp. 18-20.) When asked whether there was a "more reliable way to determine property boundaries" than the way he did it, Mr. Gobelman testified that "you can GPS them." (Motion to Exclude, Exhibit O, pp. 79:17-80:7.)

This is ironic since GPS coordinates *were* readily available and, in fact, in Mr. Gobelman's possession. They were contained in the AECOM Final Survey done by CQM mentioned many times in the Gobelman Initial Report. (Motion to Exclude, Exhibit D, pp. 2-5 and Appendix D.) Despite having testified that using GPS coordinates would be a more reliable way to determine Site boundaries than his method, Mr. Gobelman did not use the AECOM Final

Site Survey GPS data in plotting the Site 3 boundaries on either of his Base Maps,⁶ likely because he had claimed in his Initial Report, albeit erroneously, that the AECOM Final Site Survey was inaccurate. (Motion to Exclude, Exhibit D, pp. 2-4 (relying on a fence line, not the AECOM Final Site Survey, to determine the Site boundaries because he believed the AECOM Final Site Survey grid coordinates did not match those of other surveys and maps in the record).) Mr. Gobelman nevertheless *did* use the AECOM Final Site Survey, which he had claimed was wrong, to plot the Removal Areas associated with the Nicor Gas Line, the NorthShore Gas Line and the City of Waukegan Water Line on his Base Maps and Features. (Motion to Exclude, Exhibit D, p. 5.) Mr. Gobelman cannot claim that the AECOM Final Site Survey is both inaccurate and accurate and choose to rely only on portions of it when it aids IDOT's case.

b. IDOT Mischaracterizes the Record in Claiming that Mr. Gobelman should have relied on AECOM information to create his Base Map.

IDOT purported to defend Mr. Gobelman's failure to rely on AECOM information for his Base Maps and related Figures by claiming that there is no "USEPA-approved" AECOM map of Site 3. (IDOT Opposition, p. 15.) To the contrary, USEPA approved the final EE/CA and the final Remedial Action Work Plan ("RAWP"), both of which contain AECOM maps produced using AutoCAD. (Motion to Exclude, Exhibit L, ¶¶ 2-4.) To claim that these maps were not approved by USEPA demonstrates a fundamental misunderstanding of the Administrative Order on Consent, the Enforcement Action Memorandum, and USEPA's processes and protocols.

22

⁽Motion to Exclude, Exhibit F, p. 1; Exhibit 3, ¶ 3 (claiming that the revised base map changed only the location of Parcel No. 0393, which required him to move to the south only the northern boundary of Site 3 and Site 3 borings).)

IDOT also argued that these USEPA-approved maps were not created for attribution purposes and thus cannot be used for such purposes. (IDOT Opposition, p. 15.) But this argument wholly undercuts all of Mr. Gobelman's opinions as he used AECOM maps (some of which were contained in drafts of the RAWPs) to create his Base Maps and Figure supporting his attribution opinions. More importantly, IDOT misses the point that, by approving certain AECOM maps (which served as the basis for the Liability Maps), USEPA deemed them to be accurate. As a result, Mr. Gobelman should have relied on them instead of trying to cobble together his own map using inconsistent and unreliable sources.

c. Mr. Gobelman Erroneously Relied on ELM Figure 15 to Plot Site 3 Borings.

In addition to his treatment of the AECOM information, Mr. Gobelman also erroneously relied on draft ELM Figure 15. According to Mr. Dorgan, who the Hearing Officer has qualified as an environmental expert previously (Order, pp. 3-4), environmental experts do not typically rely on draft maps, maps that lack northings and eastings, or very difficult-to-read maps, especially when more reliable maps are readily available. (Motion to Exclude, Exhibit J, ¶ 5.) Mr. Nguyen, the AutoCAD manager at Mr. Gobelman's employer, agrees. (Motion to Exclude, Exhibit P, pp. 42:2-8, 47:20-22 (testifying that when adding boring locations to a Base Map, you must have the "north east" of the borings themselves to ensure that they line up).) Rather than relying on AECOM's more accurate maps for the Site 3 boring locations, such as Hearing Exhibit 67-534, Mr. Gobelman relied on ELM Figure 15, a draft and difficult-to-read figure that contained approximations and lacked any northings or eastings for the borings. (Motion to Exclude, Exhibit P, pp. 42:2-43:12; Motion to Exclude, Exhibit O, pp. 98:3-11, 102:10-103:3.)

In fact, Mr. Nguyen agreed with JM that ELM Figure 15 was an unreliable source document. (Motion to Exclude, Exhibit P, pp. 42:5-21, 43:7-10 (acknowledging that one must

have northings and eastings to accurately plot borings on a base map and admitting that ELM 15 had none).) He also conceded that if Mr. Gobelman had possessed a better source document than draft ELM Figure 15, he should have used it to locate the Site 3 borings. (*Id.*, p. 43:11-19.)

In addition to ELM Figure 15 being an unreliable document, Mr. Gobelman stated in his Initial Report that the figure's Site boundaries did not line up with those he used for his Base Map. (Motion to Exclude, Exhibit D, p. 4.) If that is true, Mr. Gobelman could not have possibly plotted the Site 3 borings in the right spot. As both Mr. Gobelman and Mr. Nguyen claim, in order to create an accurate base map, your sources must line up and be consistent. (Motion to Exclude, Exhibit P, p. 29:2-8; Motion to Exclude, Exhibit O, p. 85:1-8; *see also* Motion to Exclude, Exhibit Q, p. 32:7-12.) Mr. Gobelman's base map sources are neither.

d. IDOT's Defense of Mr. Gobelman's Use of ELM Figure 15 Mischaracterized the Facts.

In its Opposition, IDOT argued that the Board relied on the ELM Report, which contains draft ELM Figure 15, "for determining the location of the Site 3 borings that the Board found IDOT liable for in its December 15, 2016 interim opinion and Order" and therefore it was appropriate for Mr. Gobelman to use it as a source for his Base Map. (IDOT Opposition, pp. 2, 16-18.) This is false. While it is true that the Board cited to ELM Figure 20 (not ELM Figure 15) generally for the proposition that ELM boring logs showed 16 locations containing ACM with six being located along Greenwood (Interim Opinion, p. 4), the statement is mere background and is not cited as part of the Board's in-depth analysis of the location of the borings in relation to work done by IDOT or in relation to Parcel No. 0393. On every occasion where the location was significant to a Board finding, the Board looked to the Liability Maps. (*Supra*, pp. 5-6.) In fact, the Board could not have relied on draft ELM Figure 15 to determine the location of Site 3 borings because their locations on draft ELM Figure 15 conflict with their

locations on the Liability Maps, a point Mr. Gobelman cannot and does not dispute. (Motion to Exclude, Exhibit D, p. 4 (Gobelman explaining that the lengths of the southern and western Site 3 boundaries on ELM Figure 15 are wrong and conflict with his Base Map).⁷)

IDOT's Opposition also misapplied the Rules of Evidence. That the larger exhibit, Exhibit 57, was discussed in the Interim Opinion on liability (IDOT Opposition, pp. 6-7), does not mean that IDOT adequately laid the foundation for Mr. Gobelman to use it as an accurate source for his Base Maps and Figures on damages under Illinois Rule of Evidence 703. Indeed, the Legend on that document admits to showing only the "approximate location of the surface and subsurface characterization boundary line." (Hearing Exhibit 57-536, attached hereto as **Exhibit 4**.)

III. The Hearing Officer Erred in Finding that Mr. Gobelman Reasonably Relied on Mr. Nguyen, Who Offered No Input Regarding the Selection of Sources or Placement of Features Onto the Base Maps and Figures.

A. IDOT Has Waived Opposition to JM's Argument that Mr. Nguyen Was Untrustworthy Because He Only Did What Mr. Gobelman Told him to Do.

JM argued, in the alternative, that if Mr. Gobelman actually relied on Mr. Nguyen to create the Base Maps and Figures, his reliance was unreasonable because Mr. Nguyen was untrustworthy. (Motion to Exclude, pp. 19-21.) IDOT conceded that this was the correct standard to apply. (IDOT Opposition, p. 19.) Contrary to the suggestion in IDOT's Opposition, JM did not argue that, as a general matter, Mr. Nguyen lacked experience in the software used to create the Base Maps, AutoCAD. JM instead argued that Mr. Nguyen did not exercise any judgment in creating the Base Maps since Mr. Nguyen testified that he did only what Mr. Gobelman told him to do and would not correct Mr. Gobelman even if he believed that Mr.

25

Just because a document is part of the Administrative Record does not mean that draft figures contained within it, which depict Site features as of a certain date, will never change as Site knowledge and work evolves. ELM Figure 15 was drafted in 1998, which is 18 years before the approval of the Final RAWP in March 2016.

Gobelman had erred in plotting any item on the Base Maps/Figures or in using unreliable source material, such as ELM Figure 15. (*See supra*, pp. 10-12.) IDOT never addressed this pivotal point, but rather supported JM's contention by arguing that Mr. Gobelman alone created the Base Maps and Figures. (*Supra*, pp. 8-12.) As a result, IDOT has waived opposition to this argument. 35 Ill. Admin. Code 101.500(d).

B. The Hearing Officer Erred in Determining Mr. Gobelman's Reliance Was Reasonable.

The Hearing Officer's Order side-steps JM's fundamental point that Mr. Gobelman was nothing more than a puppet when it came to the creation of the Base Maps and Figures. He merely rules, without explanation, that "Mr. Gobelman's reliance on Mr. Nguyen's CAD work was reasonable." (Order, p. 7.) In doing so, the Hearing Officer fails to consider that Mr. Nguyen admits to merely following Mr. Gobelman's directions and using none of his own experience in working on the Base Maps and Figures, including that he provided no input on source selection or Key Feature locations. Without evaluating this issue, it was improper for the Hearing Officer to rule that Mr. Gobelman's reliance on Mr. Nguyen (for some unidentifiable act) was reasonable. This is especially so given that Mr. Gobelman, Mr. Nguyen, and IDOT all aver that Mr. Gobelman made these key decisions and created the Base Maps. (*Supra*, pp. 8-12.)

C. JM's Motion to Exclude on This Foundational Argument should have been Granted.

Had the Hearing Officer examined this, he should have found Mr. Gobelman wrong to rely on Mr. Nguyen. In the capacity he was used here by Mr. Gobelman, Mr. Nguyen was untrustworthy and did nothing to correct or validate Mr. Gobelman's faulty work. An expert witness may rely on materials gathered by experts in other specialties, but the "third party technician upon which the expert relies must be trustworthy." *McKinney*, *McKinney* v. Hobart

Bros. Co., 2018 IL App (4th) 170333, ¶ 46.8 "[E]xpert witnesses commonly rely on facts or data gathered by experts in other specialties—for example, 'an X ray or other laboratory analysis which is typically performed by a technician or laboratory scientist other than the testifying expert." Id. (quoting Kurrack v. American Dist. Telegraph Co., 252 Ill. App. 3d 885, 897-98 (Ill. App. Ct. 1993)). But this is not what happened here, though, as the proponent of the evidence, it was IDOT's burden to lay a foundation for an expert opinion based upon the work of others (including sufficient foundation that any reliance on the work of others is reasonable). McKinney, 2018 IL App (4th) 170333, at ¶ 47.

Since Mr. Nguyen admits he exercised no judgment in what he was doing, but rather followed Mr. Gobelman's directions without question, he was not a "trustworthy" third party technician and any reliance by Mr. Gobelman beyond using him to plot the dots and lines on AutoCad where Mr. Gobelman directed, was improper and undermines the foundation of the Base Maps and Figures contained in his Reports. *McKinney*, 2018 IL App (4th) 170333, at ¶ 46 (allowing expert to rely on studies performed by another, trustworthy expert to testify on causation). The Hearing Officer's Order should be reversed on this point.

Conclusion

For the reasons stated above, Johns Manville respectfully requests that the Board allow this Interlocutory Appeal, reverse the Hearing Officer Order on JM's Motion to Exclude, and exclude IDOT from introducing any evidence, testimony, or exhibits/figures relating to or premised on the "Base Maps" and related "Figures" prepared by Andrews Engineering, Inc., including those contained in the Gobelman Initial and Supplemental Reports⁹ as well as all cost

BOOT agreed that an expert cannot rely on an untrustworthy expert to assist with his or her expert opinions, but the Hearing Officer did not address the merits of this point. (IDOT Opposition, p. 19.)

Draft Base Maps and Figures exist in the record and should also be excluded.

attributions opinions of Mr. Gobelman based upon said Base Maps/Figures, which is every attribution opinion contained in his Reports (with the exception of opinions regarding costs associated with the Nicor Gas Line). JM also respectfully requests that the Board grant any other relief it deems appropriate.

Dated: November 14, 2019 Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on November 14, 2019, I caused to be served a true and

correct copy of Complainant's Motion For Interlocutory Appeal and Interlocutory Appeal Of

Hearing Officer's Order Denying Complainant's Motion to Exclude Base Maps and Related

Figures and Testimony at Hearing upon all parties listed on the Service List by sending the

documents via e-mail to all persons listed on the Service List, addressed to each person's e-mail

address.

/s/ Lauren J. Caisman____

Lauren J. Caisman

29

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EXHIBIT 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)
JOHNS MANVILLE, a Delaware corporation,)))
Complainant,) PCB No. 14-3
v.)
ILLINOIS DEPARTMENT OF)
TRANSPORTATION,)
Respondent.)

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on September 13, 2019, I caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, *Complainant's Motion to Exclude Base Maps and Related Figures and Testimony at Hearing*, a copy of which is attached hereto and herewith served upon you via e-mail. Paper hardcopies of this filing will be made available upon request.

Dated: September 13, 2019 Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)
JOHNS MANVILLE, a Delaware corporation,)))
Complainant,) PCB No. 14-3
v.)
ILLINOIS DEPARTMENT OF TRANSPORTATION,)))
Respondent.)

COMPLAINANT'S MOTION TO EXCLUDE BASE MAPS AND RELATED FIGURES AND TESTIMONY AT HEARING

Complainant JOHNS MANVILLE ("JM") hereby submits its Motion to Exclude Respondent ILLINOIS DEPARTMENT OF TRANSPORTATION ("IDOT") from introducing any evidence, testimony, or exhibits/figures relating to or premised on "Base Maps" and related figures prepared by Andrews Engineering, Inc., including those contained in the "Expert Rebuttal Report of Steven Gobelman On Damages Attributable to IDOT Based on IPCB Order of December 15, 2016" dated August 22, 2018 ("Gobelman Initial Report") and the "Expert Rebuttal Supplemental Report of Steven Gobelman On Damages Attributable to IDOT Based on IPCB Order of December 15, 2016" dated November 7, 2018 ("Gobelman Supplemental Report"). This includes, without limitation, Figures 1-8 from both Reports, Ex-1 from the Gobelman Initial Report, Ex-2 from both Reports, and all cost attributions to IDOT based upon said Base Maps/Figures, which is every attribution with the exception of the Nicor Gas Line. (See Gobelman Initial Report, § 7; Gobelman Supplemental Report, § 4.)

THE BOARD'S INTERIM OPINION AND ORDER

On December 15, 2016, the Board issued its Interim Opinion and Order ("Order") finding that IDOT violated Sections 21(a), (d) and (e) of the Illinois Environmental Protection Act (the "Act"), holding:

IDOT caused open dumping of ACM waste along the south side of Greenwood Avenue within Site 6 and adjacent areas along the north edge of Site 3. IDOT allows open dumping to continue as long as ACM waste remains at these locations. The Board further finds that IDOT allowed open dumping of ACM waste on the portion of Site 3 within Parcel 0393. The Board therefore finds that IDOT violated Section 21(a) of the Act. 415 ILCS 21(a) (2014). IDOT also violated Section 21(d) by conducting an unpermitted waste disposal operation [on Parcel 0393], and Section 21(e) by illegally disposing waste. 415 ILCS 5/21(d), (e) (2014).

(Order, p. 22.) The Board found IDOT liable for contamination in Parcel No. 0393 as well as in areas on the south side of Site 6 and the northern portion of Site 3. (*Id.*, p. 13.) The Board used soil boring locations that had been plotted on maps used at the initial Hearing in the summer of 2016 to assist in identifying the areas on Site 3 (outside of Parcel No. 0393) and Site 6¹ where the Board had found IDOT liable. (*Id.*)

In then looking to fashion an appropriate remedy, the Board weighed every equitable factor *against* IDOT and in favor of JM and ordered that IDOT must reimburse JM for certain cleanup costs it had incurred "as a result of [IDOT]'s violations" and to ensure fulfillment of the Act's stated purpose that "adverse effects on the environment are borne by those who cause them." (*Id.*, p. 21.) Needing a more fulsome record on cleanup costs, however, the Board directed the Hearing Officer to conduct a hearing for evidence on the following issues:

- 1. The cleanup work performed by JM in the portions of Site 3 and Site 6 where the Board found IDOT responsible for ACM waste present in soil.
- 2. The amount and reasonableness of JM's costs for this work.

¹ Site 3 and Site 6 are collectively referred to herein as the "Sites."

3. The share of the JM's costs attributable to IDOT.

(*Id.*, p. 22.) The work accomplished to investigate the Sites and to implement the removal action is referred to herein as "Removal Work."

RELEVANT PROCEDURAL HISTORY

While JM and IDOT agree on the "amount and reasonableness" of the costs JM incurred to conduct the Removal Work on the Sites (*see* Stipulations filed August 13, 2019 ("Stipulations"), attached hereto as **Exhibit A**), they do not agree on "where the Board found IDOT responsible for ACM waste present in soil" and "the share of JM's costs attributable to IDOT." More specifically, what remains in dispute is: (1) the exact areas where JM did Removal Work ("Removal Areas"); (2) the areas where IDOT is responsible for ACM waste present in the soil ("IDOT Areas of Liability"); (3) the extent to which the Removal Areas are connected to the disputed IDOT Areas of Liability; and (4) the amount of the costs that should be *attributed* to IDOT.

Because the Board's Order finding IDOT liable was tied to the location of Parcel No. 0393 and the locations of various soil borings, it is critical for the Board to be able to easily identify the locations of the following: (a) the boundaries of Sites 3 and 6; (b) the boundaries of Parcel No. 0393; (c) the location of various soil borings and the contaminated areas they represent; and (d) the Removal Areas (collectively, the "Key Features"). These Key Features should underpin the Board's decisions on "where the Board found IDOT responsible for ACM waste present in the soil" and "the share of JM's costs attributable to IDOT."

After an additional two years of discovery, there are five expert reports that have been produced on the issues identified by the Board's Order: three reports from JM's expert, Mr. Douglas Dorgan, Jr., and two reports from IDOT's proffered expert, Mr. Steven Gobelman, the same expert IDOT used in the first Hearing. On June 13, 2018, JM's expert, Mr. Douglas

Dorgan, Jr. served his Expert Report. (*See* Expert Report of Douglas G. Dorgan, Jr. On Damages Attributable to IDOT dated June 13, 2018 ("Dorgan Expert Report"), attached hereto as **Exhibit B**). In the Dorgan Expert Report, Mr. Dorgan determined, to a reasonable degree of professional certainty, that:

- 1. Johns Manville incurred costs of \$5,579,794 for implementing the AOC [Administrative Order on Consent] at Site 3 and Site 6 ("Implementation Costs").
- 2. The Implementation Costs are reasonable and appropriate considering the work required and performed.
- 3. JM has incurred \$3,274,917 in Implementation Costs that are attributable to IDOT.

(*Id.*, p. 1.)

Mr. Dorgan's opinions were based on interviews of, and documents and invoices from, the vendors that actually performed Removal Work on the Sites. (*Id.*, § 2, pp. 6-9.) Mr. Dorgan and the vendors categorized the Removal Work performed on Sites 3 and 6 into "Task Buckets," which comprised distinct aspects of the Removal Work on the Sites. The "Task Buckets" are: (1) Nicor Gas Line; (2) City of Waukegan Water Line; (3) AT&T; (4) Utility/ACM Soils Excavation; (5) Northeast Excavation; (6) North Shore Gas; (7) Dewatering; (8) Filling and Capping work; (9) Ramp Work; (10) General Site and Preparation Work; (11) Health and Safety; (12) USEPA Oversight; and (13) Costs for Legal/Legal Support Services (Manikas/Walker, Wilcox & Matousek). (*Id.*, § 3.2, p. 33.) The appropriate costs were then allocated into each Task Bucket.² (*Id.*)

In reaching his expert opinions on the issues identified in the Board's Order, Mr. Dorgan used maps prepared by AECOM to depict the Key Features on his Figure 1 ("Dorgan 1,"

² For example, all of the costs associated with work required and performed with respect to the North Shore Gas line on Sites 3 and 6 are contained in the "North Shore Gas" Task Bucket.

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attached hereto as **Exhibit C**). (*See* Dorgan Expert Report, § 1.3, pp. 3-4.) Mr. Dorgan then determined the IDOT Areas of Liability. He did this by reviewing Dorgan 1 and the record to determine the extent to which Removal Work done in Removal Areas was caused by the presence of ACM for which the Board had found IDOT liable. Mr. Dorgan then identified which of JM's Implementation Costs were attributable to his IDOT Areas of Liability for each Task Bucket.

On August 22, 2018, IDOT's purported expert, Mr. Steven Gobelman, served his Initial Report, attached hereto as **Exhibit D**. Mr. Gobelman did not dispute Mr. Dorgan's Task Buckets or the amount of money Mr. Dorgan placed in each Task Bucket. (Gobelman Initial Report, §§ 3, 4, pp. 2-3.) In fact, the parties have stipulated not only that JM incurred \$5,579,794 with respect to Sites 3 and 6 and that said costs are reasonable, but also that the costs Mr. Dorgan allocated to each Task Bucket were correct and reasonable. (*See* Stipulations.) Mr. Gobelman's primary issues with the Dorgan Expert Report centered on: (1) how Mr. Dorgan defined the IDOT Areas of Liability (Gobelman Initial Report, §§ 5.2, 5.3, pp. 5-6); (2) the accuracy of various figures contained in the record, including where those figures placed the Key Features, which led Mr. Gobelman to create his own new figure that he referred to as his "Base Map" (*id.*, §§ 5.1, pp. 3-5); and (3) how Mr. Dorgan attributed the costs within each Task Bucket to IDOT. (*Id.*, § 6, pp. 6-17.)

On October 25, 2018, Mr. Dorgan served a rebuttal to the Gobelman Initial Report, which pointed out a number of flaws in Mr. Gobelman's methodology, as well as inaccuracies and problems with the Base Map that Mr. Gobelman had created. (*See* Expert Rebuttal Report of Douglas Dorgan, Jr. on Damages Attributable to IDOT dated October 25, 2018 ("Dorgan Rebuttal Report"), attached hereto as **Exhibit E**.)

On November 9, 2018, Mr. Gobelman served the Gobelman Supplemental Report (attached hereto as **Exhibit F**), ostensibly to correct *only* the location of Parcel No. 0393 on his "Base Map." On April 30, 2019, Mr. Dorgan served a supplemental rebuttal report to the Gobelman Supplemental Report, which opined that Mr. Gobelman's Base Map was still flawed. (*See* Expert Supplemental Rebuttal Report of Douglas Dorgan, Jr. on Damages Attributable to IDOT dated April 30, 2019 ("Dorgan Supplemental Rebuttal Report"), attached hereto as **Exhibit G**.)

DORGAN 1 AND THE BASE MAP

AECOM³ has served as JM's environmental consultant for the environmental work performed at the Sites since at least 2007. (*See* Dorgan Expert Report, § 2.1.1, p. 6.) AECOM: conducted much of the sampling at the Sites; identified and delineated the Site boundaries; prepared multiple versions of the EE/CA for the Sites; prepared and implemented the Remedial Action Work Plan for the Sites; and prepared the Final Report for the Sites post-remediation. (*Id.*, including Att. 5.)

In the first five-day Hearing of this case, Mr. Dorgan generated and relied upon Exhibits 06-26 (attached hereto as **Exhibit H**) and 16-18 (attached hereto as **Exhibit I**). (Declaration of Douglas J. Dorgan, Jr. ("Dorgan Dec."), attached hereto as **Exhibit J**, ¶¶ 3, 7.) These exhibits, which were based upon AECOM maps, served as the template for Dorgan 1. (*Id.*) Exhibits 06-26 and 16-18 were admitted into evidence without objection and were relied upon by the Board in reaching a decision in its Order. (Order, p. 22 (identifying areas of liability based upon boring locations contained on maps admitted into the record); Hearing Report, attached hereto as **Exhibit K** (identifying exhibits admitted into evidence).)

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³ At times, AECOM was known as Arcadis or LFR.

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The only material difference between Hearing Exhibits 06-26 and 16-18 and Dorgan 1 is the addition of the Removal Areas contained in AECOM's Remedial Action Work Plan and Final Report, including but not limited to, the location of the excavation utility work. (Dorgan Dec., ¶ 10.) Each of the underlying AECOM maps used in Exhibit 06-26, Exhibit 16-18, and Dorgan 1 were sent to and ultimately approved by United States Environmental Protection Agency ("USEPA") after the USEPA's opportunity for comment. (Declaration of Dr. Tatsuji Ebihara ("Ebihara Dec."), attached hereto as **Exhibit L**, ¶ 4.)

In the first hearing, Mr. Gobelman also relied upon maps, Exhibit 90 (attached hereto as **Exhibit M**) and Exhibit 202 (attached hereto as **Exhibit N**), which too were admitted into evidence. These maps were also based upon documents generated by AECOM (*see* Transcript of Deposition of Steven Gobelman dated October 2, 2018 ("Gobelman I Dep."), attached hereto as **Exhibit O**, pp. 55:22-56:5), which can be seen by comparing these Exhibits to Exhibits 06-16 and 16-18. In other words, the exhibits used by both experts during the first Hearing relied upon the AECOM maps as source material. (Dorgan Dec., ¶¶ 7-8.)

But when it came time to determine the IDOT Areas of Liability and the amount of costs for which IDOT was liable—almost two years since Hearing in this matter and more than a year and a half since the Board's Order—Mr. Gobelman changed his methodology. He did not use his Hearing Exhibits 90 and 202 or the AECOM maps he and/or the Board relied upon at the first Hearing. Instead, Mr. Gobelman decided to create a new map—which Mr. Gobelman referred to as his "Base Map"—with the assistance of his colleague (Michael Nguyen, a "CAD manager"). The Base Map was created from "scratch" with different Key Features, including different Site 3/6 boundaries, different soil boring locations, and different Removal Areas. (Gobelman Initial Report, pp. 3-5; Gobelman I Dep., p. 55:3-11 (Base Map created "from scratch" using "various

⁴ CAD is a computer aided design and drafting technology, which is routinely used to make maps.

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reports because the rest of my dealings was [sic] going to be based upon that base map and I needed to have it as accurate as I thought it could be").) This Base Map served as the foundation for each of the figures contained in Mr. Gobelman's Initial and Supplemental Reports. (Transcript of Deposition of Michael Nguyen ("Nguyen Dep."), attached hereto as **Exhibit P**, p. 52:19-22 (admitting that the Base Map was "used as the basis or the foundation for the other maps").)

According to Mr. Gobleman, this new Base Map was "necessary" because his review of various figures "showing the location of Sites 3 and 6 revealed the location of Sites 3 and 6 were not consistently located on the various figures." (Gobelman Initial Report, p. 3.) All of Mr. Gobelman's opinions on which areas constitute IDOT Areas of Liability or Removal Areas, and each of his attribution opinions, are founded upon his Base Map. (*Id.*, § 5.1, p. 3 (stating that in order to assess the costs he had "to create a base map"); *id.*, § 6, pp. 7-16; *see also* Gobelman Supplemental Report, Figures 4, 5, 6, and 8 and Legends on Figures (shading the areas on his Base Map that Mr. Gobelman considered to be "attributable to IDOT").) The connection between the Base Maps and Mr. Gobelman's opinions is exemplified by the fact that when Mr. Gobelman changed the locations of the Key Features between the Base Map in his Initial Report and the Base Map in the his Supplemental Report, his opinions on which costs were attributable to IDOT changed. (Gobelman Supplemental Report, pp. 7-8, Figures 4, 5, 6, 8 and Legends on Figures (changing the shading of the IDOT Areas of Liability on the Base Map).)

IDOT should be barred from introducing or eliciting testimony concerning the Base Maps from anyone, including without limitation, Mr. Gobelman and Mr. Nguyen. As discussed more fully below, Mr. Gobelman lacked the expertise to create his Base Maps. It is therefore not surprising that the Base Maps lack adequate foundation. Consequently, the Base Maps and

related Figures, as well as any testimony thereon, should be should be excluded from evidence going forward.

ARGUMENT

Exclusion is warranted on two bases. First, Mr. Gobelman lacks expertise to offer any opinions relating to or stemming from the Base Maps. He admitted during his deposition that he had lacked expertise to create Base Maps. (*See* Gobelman I Dep., pp. 18:2-16, 96:6-12; Transcript of Steven Gobelman dated February 7, 2019 ("Gobelman II Dep."), attached hereto as **Exhibit Q**, p. 13:5-19.) Yet Mr. Gobelman controlled the entire Base Map creation process without any material or meaningful input from his colleague, Mr. Nguyen, who has experience creating base maps. Second, sufficient foundation for the Base Maps is lacking and cannot be established. Not only did Mr. Gobelman fail to adhere to well-established scientific standards, leading to critical mistakes in creating the Base Maps, but also he did not rely on information of the type reasonably relied upon by experts in the relevant field when preparing a base map. And, to the extent Mr. Gobelman relied upon Mr. Nguyen's expertise in the creation of the Base Maps, his reliance was unreasonable. For these reasons, IDOT should be barred from introducing or eliciting any testimony regarding the Base Maps and its related Figures.

I. Mr. Gobelman Lacks The Requisite Knowledge, Skill, Experience, Education, And Expertise To Have Created The Base Maps

Illinois Rule of Evidence 702 provides:

If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in qualified knowledge, witness as an expert by experience, training, or education, may testify thereto in the form of an opinion or otherwise. Where an expert witness testifies to an opinion based on a new or novel scientific methodology principle, the proponent of the opinion has the burden of showing the methodology or scientific principle on which the opinion is based is sufficiently established to have gained general acceptance in the particular field in which it belongs.

Mr. Gobelman readily concedes that he did not rely on any expertise of his own to create the Base Maps. (Gobelman I Dep., p. 96:6-12; Gobelman II Dep., p. 13:5-19 (stating that he is not relying on any personal expertise in making changes to the Base Map).) Mr. Gobelman could not have so relied as he acknowledges that he is <u>not</u> an expert in AutoCAD, the program used to create the Base Maps. (Gobelman I Dep., p. 18:2-16 (identifying his experience as having "played" with AutoCAD drawings, as "minimal," and as limited to "simple stuff").) Nor does he claim to have any expertise in surveying or plotting the location(s) of properties based on legal descriptions. (*Id.* (testifying that he has no experience in "creating surveys").)

Rather, Mr. Gobelman appears to rest and rely exclusively on Mr. Nguyen's AutoCAD work and, therefore, on Mr. Nguyen to ensure the Base Maps' accuracy. (*See*, *e.g.*, Gobelman II Dep., pp. 8:3-11, 9:7-10:4 (stating that he asked Mr. Nguyen to determine if the Base Map was wrong after reviewing Mr. Dorgan's Initial Expert Rebuttal); *id.*, p. 13:5-19 (claiming that Mr. Nguyen performed the actual plotting work); *id.*, p. 23:14-20.)

But Mr. Nguyen utterly denies that he played this key role. When asked why a change in the location of Parcel No. 0393 required him to move the northern boundary of Site 3 on the Base Map, he testified: "I don't know. I'm not the decision maker on why I moved that thing." (Nguyen Dep., p. 68:3-15.) Instead, he moved things or made edits to drafts of the Base Map only at the direction of Mr. Gobelman. (*Id.*, p. 73:4-10 (stating that Mr. Gobleman told him what to change and when asked if he "would make any changes on his own," he responded, "No, no, I have other things to do. I'm not – no, no no. For the record, no."); *id.*, pp. 31:9-32:2 (when asked why he adjusted the property lines in the November Rebuttal, he said, "No, not me. It's because Mr. Steve had some different source . . . he just emailed me and said, this is the file to

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use" and stating that he was not involved in determining if there were discrepancies in the maps); *id.*, p. 63:7-10 (testifying that he has no recollection of a discussion about "putting the site boundary along the fence line").) In fact, Mr. Nguyen went so far as to say that he would place features in a location even if he thought Mr. Gobelman was wrong about where he wanted them placed on the Base Maps:

- Q: If he wanted you to move something that you disagreed with, would you tell him that or would you just move it?
- A: If he tell me to move it, I'd move it . . .

(*Id.*, p. 67:16-20.)

In essence, Mr. Nguyen did what Mr. Gobelman asked without question. But without the expertise in using the AutoCAD program or plotting surveys, Mr. Gobelman had, and continues to have, no way to verify whether his Base Maps are accurate. Because all of Mr. Gobelman's opinions hinge on the Base Maps and their accuracy, Mr. Gobelman should be precluded from offering any opinion testimony on the Base Maps that he lacked the expertise to create.

II. The Base Maps Lack Adequate Foundation

"For expert testimony to be admissible, an adequate foundation must be laid establishing that the information that the expert bases the opinion upon is reliable." *Taylor v. Cnty. of Cook*, 2011 IL App (1st) 093085, ¶ 32; *Kruzek v. Estate of Kruzek*, 2012 IL App (1st) 121239-U, ¶ 31 (limiting testimony based on lack of reliable foundation); ILL. R. EVID. 703. It is the burden of the proponent of expert testimony to lay this foundation. *People v. Safford*, 392 Ill. App. 3d 212, 221 (1st Dist. 2009) (trial court erred when it allowed proposed expert examiner to testify to conclusions without providing evidentiary foundation for his opinion).

A tribunal "is not required to blindly accept the expert's assertion that his testimony has an adequate foundation. Rather, the trial court must look behind the expert's conclusion and

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analyze the adequacy of the foundation." *Soto v. Gaytan*, 313 Ill. App. 3d 137, 146 (2d Dist. 2000). After all, an "expert's opinion is only as valid as the reasons for the opinion." *Perona v. Volkswagen of America, Inc.*, 2014 IL App (1st) 130748, ¶ 51; *Todd W. Musburger, Ltd. v. Meier*, 394 Ill. App. 3d 781 (1st Dist. 2009). In other words, if the expert's opinion lacks factual support or fails to follows established standards, it should not be received. *Musburger*, 394 Ill. App. 3d at 802 (affirming barring expert opinion that lacked factual basis); *In re Marriage of Cutler*, 334 Ill. App. 3d 731, 736–37 (5th Dist. 2002) (expert opinion should not have been received because it lacked a proper foundation).

A. The Base Maps Lack Foundation Because their Creation Did Not Rely On and/or Follow Appropriate, Applicable Standards.

"Where an expert's opinion is based upon improper elements, his testimony is incompetent and may be excluded or stricken upon a proper motion." *City of Chi. Dep't of Transp. v. Bouy*, 69 Ill. App. 3d 29, 38 (4th Dist. 1979) (upholding exclusion of expert testimony that was based upon "an improper application of the income method of appraisal"); *People v. McKown*, 236 Ill. 2d 278, 310-11 (Ill. 2010) (finding reversible error when the person performing the test upon which the scientific testimony was based "failed to perform the test in compliance with" the applicable standards and thus the testimony lacked a "proper foundation"). Stated differently, expert opinions lack foundation when the expert makes obvious mistakes in applying a methodology or in reaching an opinion. *People v. Thill*, 297 Ill. App. 3d 7, 13 (2d Dist. 1998) ("Given these serious flaws in the basis for [the expert]'s opinion, we find that the trial court erred in failing to strike [the expert]'s opinion.").

1. The Base Maps Were Not Created with Reliable and Available Sources or Corroborated with Reliable and Available Sources.

If Mr. Gobelman's goal, as stated in his deposition, was to create a Base Map "he could depend upon" and that was "as accurate as [he] thought it could be" (Gobelman I Dep., p. 55:3-11), he did not achieve this goal. When creating a base map for environmental purposes, it is well-established that reliable sources of information originate with the entity that conducted the underlying environmental work, especially if that work has been accepted by a regulatory agency. (Dorgan Dec., ¶ 6.) It is undisputed that the work Mr. Gobelman attempted to depict on the Base Maps was done by AECOM and approved by USEPA. Yet Mr. Gobelman chose largely to ignore AECOM's source information in creating the initial Base Map in the Gobelman Initial Report or in "supplementing" it in the Gobelman Supplemental Report, electing instead to rely on his own observations of a Google image and other unreliable materials.

For instance, despite the fact that AECOM used GPS to geo-locate the northern boundary of Site 3 at 2083127.1N on a Final Site Survey conducted by CQM ("Final Site Survey"), Mr. Gobelman discarded this critical fact and instead placed the northern boundary of Site 3 about 13 feet to the north at about 2083140N in his Initial Report. Mr. Gobelman did so based on his claim that a fence he saw on an aerial Google image existed at that location and should be used to demarcate the northern boundary of Site 3. (Gobelman I Dep., p. 72:8-14; Gobelman II Dep., p. 24:13-21 (stating he still thinks the fence depicts "the area that was of Site 3").) Not surprisingly, the boundaries contained in Mr. Gobelman's Base Maps conflict with AECOM's Final Site Survey Site 3 boundaries. (See, e.g., Gobelman Initial Report, Ex-2 (showing the property boundaries on his map in black compared to the property boundaries in the Final Site Survey in green); Dorgan Supplemental Rebuttal Report, Figures 1A, 1B.) The Site 6 test pit locations similarly conflict with AECOM data. (Dorgan Supplemental Rebuttal Report, Figures 1A, 1B.) Ironically, when asked whether there was a "more reliable way to determine property

⁵ This document is actually attached as an exhibit to Mr. Gobelman's Initial Report.

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boundaries" than the way he did it, Mr. Gobelman testified that "you can GPS them" (Gobelman I Dep., pp. 79:17-80:7), which is exactly what AECOM had done on the Final Site Survey and exactly what Mr. Gobelman ignored. (*Id.*)

Had the Base Maps relied upon or been corroborated with available, reliable source materials, the miscalculations and errors in the Base Maps (as further described below and in the Dorgan Rebuttal Report and Dorgan Supplemental Rebuttal Report) would have been readily apparent to Mr. Gobelman (or, at least, readily apparent to someone with expertise in AutoCAD or plotting). Because they were not, however, the Base Maps and any testimony associated with or about them must be excluded.

2. Key Features Were Not Placed Correctly on the Base Map. 6

Given the failures in the process of creating the Base Maps, the locations of the Northeast Excavation and the Site 3 borings, among others, fail to align with their locations as depicted on the respective AECOM maps. (*See, e.g.*, Dorgan Supplemental Rebuttal Report, Figures 1A, 1B.) Based on these Figures, it is clear that Mr. Gobelman moved the location of the Northeast Excavation from its original location in the Gobelman Initial Report slightly to the east in the Gobelman Supplemental Report, presumably so that B3-45 will appear to fall outside the boundaries of Parcel No. 0393. (*Id.* (comparing AECOM's yellow line to Gobelman's blue line); *see also* Gobelman I Dep., pp. 34:17-38:13 (discussing an earlier version of his Base Map dated April 2018, which was based off the Final Site Survey, showing the northeast excavation further to the west).) Mr. Nguyen testified that Mr. Gobelman directed the placement of the Northeast Excavation on the Base Maps—a direction Mr. Nguyen followed without question. (Nguyen Dep., p. 58:4-13.)

⁶ Mr. Gobelman testified that he used "the original base map" to create the supplemental Base Map in his Supplemental Report. (Gobelman II Dep., p. 32:13-22.) As such, if the original Base Map in the Gobelman Initial Report was wrong, so is the supplemental Base Map in the Gobelman Supplemental Report.

A similar problem exists with Mr. Gobelman's plotting of the Site 3 borings. Mr. Gobelman claimed that when he relocated the northern boundary of Site 3 downward, he needed to also relocate all Site 3 borings because his Initial Report had tied their locations to the Site 3 northern boundary. Yet when Mr. Gobelman adjusted the locations of the Site 3 borings in his Supplemental Report, he did not simply move them south; he also shifted them east. (*See* Dorgan Supplemental Rebuttal Report, Figures 1A, 1B (comparing red dots in Gobelman Initial Report and blue dots in Gobelman Supplemental Report).) And, like many other Key Features, the Site 3 borings do not align with the AECOM maps. (*Id.* (compare to yellow dots).) Because Mr. Gobelman failed to properly plot the Northeast Excavation and Site 3 borings accurately, but rather moved them in an apparent attempt to appease IDOT (as there is no other explanation), the Base Map is wrong and should be excluded, along with any related. *See Ill. Dep't. of Transp. ex rel. People v. Raphael*, 2014 IL App (2d) 130029, ¶ 20 (upholding court's exclusion of expert that used an improper valuation method).

- 3. Established Scientific Principles and Accepted Methodologies Were Not Followed in Creating the Base Maps.
 - a. The Base Maps move fixed features in space, which is not a correct methodology.

Mr. Gobelman placed the Waukegan Water Line in the wrong place. This error stems from Mr. Gobelman's fundamental failure to apprehend that fixed features do not move in space. (Dorgan Supplemental Rebuttal Report, § 2.1, p. 3.) In the Gobelman Supplemental Report, Mr. Gobelman moved the northern boundary of Site 3 *and* the location of the Waukegan Water Line more than 10 feet south. (Gobelman II Dep., p 40:2-20.) Mr. Gobelman attempted to explain his thought process as follows: "[e]verything is tied together, so if you move the northern boundary up ten feet, you're also moving the southern boundary up 10 feet. And everything associated within is locked in, so everything moves ten feet." (Gobelman I Dep., pp. 39:19-40:4.) This is

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incorrect and cannot logically be true. The Waukegan Water Line is fixed in space and was geo-

located on the Final Site Survey; put another way, its location is not dependent on an arbitrary

property line demarcation. Thus, it was improper for Mr. Gobelman to move its location.

Accordingly, the location of the Waukegan Water Line on the Base Map does not match with its

location on any other map, including the Final Site Survey. (See Dorgan Supplemental Rebuttal

Report, Figure 1A (compare AECOM yellow water line to Gobelman blue water line).) Mr.

Gobelman's failure to recognize that the movement of the northern boundary of Site 3 did not

require the movement of the Waukegan Water Line, which was geo-located in space, renders the

Base Map (and any testimony and Mr. Gobelman's opinions therefrom) unreliable. Exclusion,

therefore, is warranted.

b. The Base Maps were built using inconsistent sources, which

should not be done.

Both Mr. Gobelman and Mr. Nguyen concede that, to create an accurate Base Map, the

sources for such a map must be consistent. For example, in his deposition, Mr. Nguyen stated

that when creating an accurate AutoCAD drawing, your sources must line up and be consistent:

Q: Do these documents need to be consistent in order for the map to be accurate?

A: You mean line up?

Q: Yeah.

A: Yes, it has to be lined up, yes, consistent.

(Nguyen Dep., p. 29:2-8.) Similarly, Mr. Gobelman conceded that a common point of reference

must be used when comparing different maps:

Q. What's the reference that you -- Well, you would agree you need to have a

similar reference point in order to compare different maps --

A. Mm-hmm.

Q. -- right? Okay.

THE COURT REPORTER: Is that a yes?

THE WITNESS: Yes. Sorry.

(Gobelman I Dep., p. 85:1-8; see also Gobelman II Dep., p. 32:7-12.)

16

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Mr. Gobelman claims to have referenced the following sources for his Base Maps: (1) a Google 2018 image of Site 3 "showing the fencing around Site 3" to demarcate Site 3; (2) the legal description from the Grant of Public Highway dated August 3, 1971 for the "location of Parcel 0393" (Hearing Ex. 41-1); (3) a draft ELM map for certain "soil sampling locations" on Site 3 (Hearing Ex. 57-536); (4) AECOM's Work Plan Rev. 2, March 13, 2014, Sheet C-0022 (Hearing Ex. 66-99) for sampling locations 1S-9S on Site 6 and the Northeast Excavation; (5) the Final Site Survey (JM0040322) for the location of the Nicor Line, the North Shore Gas Line, and the City of Waukegan Water Line; (6) Mr. Dorgan's Figure 1 for the AT&T lines; and (7) a Plat of Topographic Survey by Atwell for Site boundaries. (Gobelman Initial Report, pp. 4-5; Gobelman I Dep., pp. 69:19-71:5 (stating that he started with the assumption that the Atwell Survey was correct and used it for "easterns and northerns").) With the exception of an updated Google Aerial photo, the same sources were used for both the Gobelman Initial Report and Supplemental Report.

Notwithstanding their recognition that sources must be consistent, both Mr. Gobelman and Mr. Nguyen admit that the Base Maps were put together with inconsistent sources and/or sources that lacked a common reference point. (Gobelman I Dep., pp. 66:9-67:8 (discussing Ex-1 from Gobelman Initial Report, which purportedly shows that the Atwell survey, the AECOM Final Report, and Dorgan Figure 1 boundaries are "inconsistent"); *id.*, pp. 82:21-83:14, 85:10-86:6.) The Gobelman Initial Report (*see* Ex-2 (showing boundaries from various sources do not align)) and Gobelman Supplement Report (Ex-2 (same, particularly in northwest corner)) highlight this exact point. It follows that if the source boundaries are inconsistent, then the locations of the Key Features plotted within those source boundaries are inconsistent and all of the measurements taken by Mr. Gobelman using the Base Maps to arrive at his opinions are

wrong.

In short, the Base Maps were not created "in compliance with" the standards applicable to generating maps involving environmental work, *McKown*, 236 Ill. 2d at 310, including but not limited to, because Mr. Gobelman and Mr. Nguyen: (1) failed to use reliable source documents or at least corroborate the findings with reliable source documents; (2) failed to rely on available GPS coordinates; (3) misapplied the basic scientific principle that fixed features, such as utility lines, do not move in space; and (4) disregarded accepted map-making methodologies, and violated the principle that one cannot use inconsistent sources to make an accurate map. As a result, the Base Maps and any testimony linked to them lack a "proper foundation." *Id*.

B. The Base Maps Were Not Created Using Facts/Data Reasonably Relied upon by Experts in the Field.

To lay an adequate foundation for expert testimony, "it must be shown that the facts or data relied upon by the expert are of a type reasonably relied upon by [experts] in that particular field in forming opinions or inferences." *People v. Burhans*, 2016 IL App (3d) 140462, ¶ 30.

1. Reliance on ELM Figure 15 was not Reasonable.

Environmental experts do not typically rely on draft maps, maps that lack northings and eastings, or very difficult-to-read maps, especially when more reliable maps are readily available. (Nguyen Dep., pp. 42:2-8, 47:20-22 (stating that when adding boring locations to a Base Map, you must have the "north east" of the borings themselves to ensure that they line up); Dorgan Dec., ¶ 5.) Instead of relying on AECOM's maps for the Site 3 boring locations, such as Hearing Exhibit 67-534, Mr. Gobelman relied on ELM Figure 15, a draft, difficult-to-read figure that contained approximations and lacked any northings or eastings for the borings. (Nguyen Dep., pp. 42:2-43:12; Gobelman I Dep., pp. 98:3-11, 102:10-103:3.) Mr. Nguyen agrees that this ELM Figure was an unreliable source document. (Nguyen Dep., pp. 41:24-44:2, 46:2-20.) He

acknowledged that if he had been given a better source document than ELM Figure 15, he certainly would have used it, but that he was unaware that a better figure/map existed. (*Id.*, pp. 43:11-19.) Better figures/maps did exist, but apparently Mr. Gobelman failed to bring those other AECOM figures/maps to Mr. Nguyen's attention. (*Id.*, p. 46:16-20 (stating he did not know "there were other reports that showed the borings").) Because the Base Maps relied on information experts in the field do not reasonably rely upon, they lack foundation. The Base Maps and any testimony relating to them should be excluded.

2. If Mr. Gobelman Relied upon Mr. Nguyen, the Reliance was Unreasonable.

An expert witness may rely on materials gathered by experts in other specialties, but the "third party technician upon which the expert relies must be trustworthy." *McKinney v. Hobart Bros. Co.*, 2018 IL App (4th) 170333, ¶ 46 (allowing expert to rely on studies performed by another expert to testify on causation). Indeed, "expert witnesses commonly rely on facts or data gathered by experts in other specialties—for example, 'an X ray or other laboratory analysis which is typically performed by a technician or laboratory scientist other than the testifying expert." *Id.* (quoting *Kurrack v. American Dist. Telegraph Co.*, 252 Ill. App. 3d 885, 897-98 (1st Dist. 1993)) (allowing expert to rely upon fiber burden testing performed by another expert to support his opinion because it was both reliable and the sort of information "customarily relied upon" by pathologists in forming their opinions); *People v. Sutherland*, 223 Ill. 2d 187, 281–82, (Ill. 2006) (allowing expert to testify about mitochondrial DNA even though he did not do the laboratory bench work when it was common to rely on other analysts for this type of work and there was no dispute that the underlying facts or work was reliable).

The proponent ultimately holds the burden of laying a foundation for an expert opinion based upon the work of others, including that his reliance on the work of others is reasonable.

McKinney, 2018 IL App (4th) 170333, at ¶ 47. If what Mr. Gobelman claims is correct, and he did in fact rely on Mr. Nguyen to create the Base Maps, Mr. Gobelman's reliance failed to meet this test.

While Mr. Nguyen concedes that he prepared all of the Figures contained in Mr. Gobelman's Initial Report and Supplemental Report based "mostly on PDF files" obtained from Mr. Gobelman (Nguyen Dep., pp. 24:17-25:12), Mr. Nguyen denies taking any independent action or exercising any judgment in creating the Base Maps. (*Id.*, pp. 31:9-32:2, 63:7-10, 68:3-15, 73:4-10.) In fact, he testified that, if Mr. Gobelman told him to make a change to the Base Maps, he would make that change even if he thought the change was wrong or inaccurate. (*Id.*, p. 67:16-20.) He also admits that he used source documents, such as ELM Figure 15, that he did not believe were reliable (*supra* § II.B.1), yet he did not bother to ask if a better source documents were available. (Nguyen Dep., pp. 25:3-12 (claiming he used only what Mr. Gobelman sent him); pp. 31:21-32:2, 43:11-44:2.)

Indeed, when asked if it was appropriate methodology to use a draft map such as ELM Figure 15 as a Base Map source, he said, "[I]ike again, on the figure, whatever the project manager provides me what to use, I'm using. I don't have, like, saying, no, don't use this, don't use that." (*Id.*, p. 26:12-23.) Since Mr. Nguyen admits he was just doing what Mr. Gobelman, who he knew lacked expertise, told him to do and did not exercise any independent judgment or discretion or bother to verify, when confronted with an unreliable source, whether a better source existed, he was not a "trustworthy" third party technician. *McKinney*, 2018 IL App (4th) 170333, at ¶ 46. Therefore, if Mr. Gobelman actually relied on Mr. Nguyen to create the Base Maps, his reliance was unreasonable, especially after having been made aware of all the mistakes in the Base Maps that Mr. Dorgan had identified in the Dorgan Rebuttal Report. After all, the

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Base Maps are the most significant aspect of Mr. Gobelman's Reports and the premise upon

which all of his opinions are based. In essence, Mr. Nguyen did what Mr. Gobelman asked

without question. The Base Maps therefore lack adequate foundation.

CONCLUSION

For the reasons stated above, Johns Manville respectfully requests that the Hearing

Officer grant this Motion and/or grant any other relief he deems appropriate. If the Hearing

Officer or Board believes that a hearing is necessary to decide the issues presented in this

Motion, JM requests that such a hearing be held at the outset of the Hearing set on November 19,

2019.

Dated: September 13, 2019

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

By:

/s/ Lauren J. Caisman

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on September 13, 2019, I caused to be served a true and

correct copy of COMPLAINANT'S MOTION TO EXCLUDE BASE MAPS AND

RELATED FIGURES AND TESTIMONY AT HEARING upon all parties listed on the

Service List by sending the documents via e-mail to all persons listed on the Service List,

addressed to each person's e-mail address.

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22

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EXHIBIT A

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)	
)	
JOHNS MANVILLE, a Delaw	are)	
corporation,)	
))
Comp	lainant,)	PCB No. 14-3
)	1
v.)	
)	
ILLINOIS DEPARTMENT O	F))
TRANSPORTATION,))
))
Respo	ndent.	1

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on August 13, 2019, I caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, *Stipulations*, a copy of which is attached hereto and herewith served upon you via e-mail. Paper hardcopies of this filing will be made available upon request.

Dated: August 13, 2019

Respectfully submitted,

BRYAN CAVE LLP

Attorneys for Johns Manville

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JOHNS MANVILLE, a Delaware corporation)	
Complainant,)	
v.)	PCB No. 14-3 (Citizen Suit)
ILLINOIS DEPARTMENT OF)	(Chizen buit)
TRANSPORTATION,)	
Respondent.)	

STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by and between all parties, that:

- 1. JM performed tasks with respect to Sites 3 and 6 that fall into the following "Task Bucket" categories, as identified in Section 3.2 and Exhibit F of the Expert Report of Douglas G. Dorgan Jr. on Damages Attributable to IDOT dated June 13, 2018 ("Dorgan Report") and Section 3 of the Expert Rebuttal Report of Steven Gobelman on Damages Attributable to IDOT Based on IPCB Order of December 15, 2016 ("Gobelman Report"): (a) Nicor Gas Line; (b) City of Waukegan Water Line; (c) AT&T; (d) Utility/ACM Soils Excavation; (e) Northeast Excavation; (f) Northshore Gas; (g) Dewatering; (h) Filling and Capping; (i) Ramp Work; (j) General Site and Preparation Work; (k) Health and Safety; (l) USEPA Oversight; and (m) Costs for Legal/Legal Support Services (Manikas/Walker, -Wilcox & Matousek).
- 2. The parties do not dispute the overall amount of costs JM has incurred with respect to Sites 3 and 6 (\$5,579,794).
- 3. The parties do not dispute the amount of costs JM has incurred under each Task Bucket as set forth in Section 3.2 and Exhibit F of the Dorgan Report, Section 6 of the Gobelman Report and the Table below:

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Task Bucket	Site 3	Site 6	Site 3 and 6	Total
Nicor Gas	\$218,090		\$360	\$218,450
City of Waukegan Water Line	\$61,037	\$86,674	0	\$147,711
AT&T	\$108,651	\$284,266	\$98,898	\$491,815
Utilities/ACM Soils Excavation	0	\$155,318	0	\$155,318
Northshore Gas	\$332,524	\$234,861	\$58,157	\$625,542
Northeast Excavation	\$49,934	0	0	\$49,934
Dewatering	\$259,084	\$160,587	\$39,175	\$458,846
Filling & Capping	\$426,254	\$310,353	\$352,012	\$1,088,619
Ramp	\$20,880	0	0	\$20,880
General Site/Site Preparation	\$932,730	\$807,329	\$74,300	\$1,814,359
Health & Safety				\$77,000
EPA Oversight	\$233,805	\$125,675	0	\$359,480
Legal Support Services			\$71,840	\$71,840

4. The parties do not dispute the reasonableness of costs set forth in the Table above in Paragraph #3.

Dated: August 13, 2019

Respectfully submitted,

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OFFICE OF THE ATTORNEY GENERAL AND THE ILLINOIS DEPARTMENT OF TRANSPORTATION

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on August 13, 2019, I caused to be served a true and correct copy of *Stipulations* upon all parties listed on the Service List by sending the documents via e-mail to all persons listed on the Service List, addressed to each person's e-mail address.

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EXHIBIT B

June 13, 2018

EXPERT REPORT OF DOUGLAS G. DORGAN JR. ON DAMAGES ATTRIBUTABLE TO IDOT

JOHNS MANVILLE VS ILLINOIS DEPARTMENT OF TRANSPORTATION

Former Johns Manville Facility Site 3 and Site 6 Waukegan, Illinois

PREPARED BY



TABLE OF CONTENTS

1	EXECUTIVE SUMMARY, SCOPE OF WORK, AND SITE BACKGROUND	1
	1.1 Qualifications	1
	1.2 Information Considered	2
	1.3 Site Location	
	1.4 Background on AOC and Scope of Remedial Action	4
	1.4.1 History of AOC	
	1.4.2 History of Scope of Remedial Action	4
2	,	
	2.1 Summary	
	2.1.1 Professional Engineering Services	
	2.1.1.1 Costs for Past Professional Engineering Services	6
	2.1.1.2 Estimated Completion Costs for Professional Engineering S	
	Rendered by AECOM	
	2.1.1.3 AECOM O&M Costs	
	2.1.2 Construction Services	
	2.1.2.1 Costs for General Contracting Services Performed by Camp Sons	
	2.1.2.2 Costs for Site Management Services Rendered by DMP PE F	
	2.1.2.3 Payments to Utilities and Fencing (Other Invoices)	
	2.1.3 Costs for Legal Services by Walker Wilcox Matousek, LLP	
	2.1.4 Costs for USEPA Regulatory Oversight	
	2.1.5 Total Implementation Costs	
	2.2 Cost Review and Reasonableness	
	2.2.1 Accuracy of Invoices and Allocations	11
	2.2.2 Project Management and Reasonableness of Implementation Cos	
	2.2.3 Costs Paid	
3	IDOT COST ATTRIBUTION	13
	3.1 Summary	13
	3.1.1 The IDOT Areas of Liability	13
	3.1.1.1 IDOT Site 3 Area of Liability	13
	3.1.1.2 IDOT Site 6 Area of Liability	
	3.2 Attribution Approach	15
	3.2.1.1 Nicor Gas	
	3.2.1.2 City of Waukegan Water Line	15
	3.2.1.3 AT&T	16
	3.2.1.4 Utility/ACM Soils Excavation	18
	3.2.1.5 Northeast Excavation	19
	3.2.1.6 North Shore Gas	
	3.2.1.7 Dewatering	22

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3.2.1.8	Filling/Capping	25
	Ramp	
	General Site/Site Preparation	
	Health and Safety	
	EPA Oversight Costs	
	Costs for Legal/Legal Support Services (Manikas/Walker Wilcox	
	Matousek)	32
3.2.2 IDOT	Attribution Summary	32
	ibution	

LIST OF FIGURES

- Figure 1 Construction Features
- Figure 2 Construction Features and Visual Transite Pipe
- Figure 3 Plan View and Profile Detour Road A
- Figure 4 Plan View and Profile Greenwood Avenue

LIST OF EXHIBITS

- Exhibit A Dorgan Resume
- Exhibit B AECOM Cost Tabulation Correspondence
- **Exhibit C DMP Cost Tabulation Table**
- **Exhibit D Manikas Invoice Table**
- **Exhibit E Johns Manville Payment Records**
- **Exhibit F Cost Allocation and IDOT Attribution Table**
- **Exhibit G Atwell Survey**

1 EXECUTIVE SUMMARY, SCOPE OF WORK, AND SITE BACKGROUND

I have been requested to provide expert opinions on behalf of Johns Manville ("JM") concerning costs incurred for investigating and implementing removal activities at Site 3 and Site 6 of the Johns Manville Southwestern Site Area located in Waukegan, Lake County, Illinois (collectively, the "Sites"). The focus of my review has been on the total costs incurred by JM, the reasonableness of those costs, and the amount of those costs attributable to IDOT based upon the Illinois Pollution Control Board's ("Board") December 15, 2016 Interim Opinion and Order in this case ("IPCB Order").

Historic investigation, removal planning, and removal implementation at the Sites have been completed pursuant to an Administrative Order on Consent No. V-W-07-C-870 ("AOC") (Hearing Exhibit 62). Pursuant to the AOC, the United States Environmental Protection Agency ("USEPA") issued an Enforcement Action Memorandum dated November 30, 2012 ("EAM") (Hearing Exhibit 65), which dictated the remedy that JM was required to implement for the Sites.

Based upon my review of the record, my interviews with various persons involved in the work and my expertise, I have developed the following general opinions to a reasonable degree of professional certainty:

- 1. Johns Manville incurred costs of \$5,579,794 for implementing the AOC at Site 3 and Site 6 ("Implementation Costs").
- 2. The Implementation Costs are reasonable and appropriate considering the work required and performed.
- 3. JM has incurred \$3,274,917 in Implementation Costs that are attributable to IDOT.

1.1 Qualifications

My resume, together with the list of my publications, is presented in **Exhibit A**. I have over 30 years of experience working as an environmental consultant. I have a Bachelor of Science in Earth Science, with a Minor in Geology, and a Master of Science in Geography with a Concentration in Environmental Science. I am a Licensed Professional Geologist in the states of Illinois and Indiana.

Since 1986, my practice has focused on providing consulting services and performing remedial investigation, planning, design, and construction for a wide range of industrial, commercial, and institutional properties. I have been qualified as an expert witness and supported litigation associated with projects involving environmental assessment, design, permitting, and engineering design and construction-related issues. I have also

implemented various projects involving compliance with the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") and under various Illinois regulatory programs. I have regularly interfaced with both the USEPA and IEPA in many contexts.

Of particular relevance to this case, I have worked on numerous commercial and industrial properties exhibiting legacy environmental impacts. I have experience assessing and remediating soils and fill material impacted by a wide range of materials, including asbestos. I also have experience supporting environmental investigation and restoration associated with Brownfield's redevelopment.

During my career, I have extensive experience:

- 1. Investigating contaminated properties;
- 2. Evaluating appropriate environmental risk mitigation options;
- 3. Designing environmental remediation programs and preparing budgets to support same;
- 4. Developing bid specifications (general and technical) and compiling bid packages;
- 5. Evaluating and presenting contractor bids for conformance with specifications and cost competitiveness;
- 6. Overseeing contractors implementing remediation activities and managing budget;
- 7. Managing projects to leverage and take advantage of value and cost-effective engineering and construction methodologies to mitigate costs to the extent possible; and
- 8. Reviewing, approving, and tabulating contractor and/or consultant costs during implementation of remediation activities to evaluate reasonableness and cost effectiveness of completed work and conformity with remediation designs and specifications.

My qualifications are also further set out in my Expert Report dated March 16, 2015 (Hearing Exhibit 6), in my Affidavit dated February 15, 2016 (Hearing Exhibit 7), and in my testimony from the first hearing in this case.

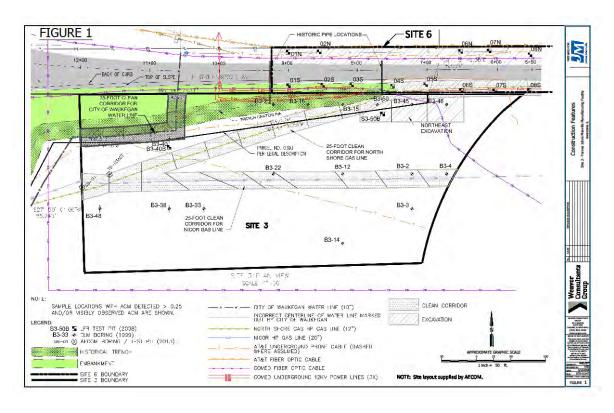
1.2 Information Considered

To prepare this Report, in addition to relying upon my experience and my involvement in the first phase of this case, I have reviewed various documents and deposition testimony associated with the investigation of the Sites, USEPA's selection of the removal action, the implementation of the removal action, and costs incurred with respect to such investigation, selection and implementation. **Exhibit B** to this Report,

prepared at my request, provides a tabulation and description of the costs JM incurred for professional engineering services performed at the Sites. **Exhibit C** to this Report, prepared at my request, presents a tabulation and description of the costs JM incurred for construction services performed at the Sites.

1.3 Site Location

Site 3 and Site 6 are shown below and on the attached Figure 1.1



The IPCB Order specifically references areas of Site 3 and Site 6 where the Board determined IDOT is responsible for the presence of asbestos containing material ("ACM"):

- 1. Where IDOT reconstructed Greenwood Avenue (samples 1S, 2S, 3S, 4S);
- 2. Where IDOT restored Site 3 after construction (samples B3-15, B3-16, B3-25);

¹ **Figure 1** was prepared using a Site Layout map provided by AECOM. I then added certain information to highlight features and areas of Site 3 and Site 6 discussed in various sections of this Report.

3. Where IDOT held an interest in and controlled the Greenwood Avenue Right-of-Way/Parcel No. 0393 (B3-15, B3-16, B3-25, B3-45, B3-50 as well as the remainder of the right-of-way).

(IPCB Order, pp. 8, 10, 13.)

1.4 Background on AOC and Scope of Remedial Action

1.4.1 History of AOC

JM entered into the AOC with USEPA in 2007. The AOC required that JM investigate and, to the extent necessary, remove ACM found at certain locations. The AOC laid out an administrative process and schedule for implementation of this work. Most of the work under the AOC took place from January of 2008 to the fall of 2016.

1.4.2 History of Scope of Remedial Action

Four revised versions of the Engineering Evaluation/Cost Analysis ("EE/CA") were submitted in response to comments received by JM from USEPA. The final EE/CA was submitted to USEPA on April 4, 2011 ("EE/CA Revision 4"). EE/CA Revision 4 evaluated four potential response action options for Sites 3 and 6, based on discussions with and requirements imposed by USEPA. These alternatives were discussed in further detail in my Expert Report dated March 16, 2015, which is incorporated herein by reference.

USEPA subsequently issued its EAM, which required a significantly more expansive remedy than what JM had proposed in EE/CA Revision 4. JM disputed the scope, cost, and technical feasibility of USEPA's EAM's selected remedy. As a result of this and additional work JM did to reduce costs, USEPA ultimately agreed to modify certain EAM requirements.

A Final Removal Action Work Plan ("RAWP") was submitted on March 31, 2014 and was approved on March 24, 2016 (see JM 0013669; Hearing Exhibits 66, 67).

The various tasks required by USEPA and performed with respect to the Sites fall into the following "Task Buckets":

- Nicor Gas Line (identified as "Nicor Gas" on Exhibit B and "Nicor" on Exhibit C);
- City of Waukegan Water Line (identified as "Waukegan Water" on **Exhibit B** and "Water Main" on **Exhibit C**);
- AT&T (identified as "AT&T" on Exhibits B and C);
- Utility/ACM Soils Excavation;
- Northeast Excavation (identified as "Northeast Excavation" on Exhibit B and "NE Excavation" on Exhibit C);

- North Shore Gas (identified as "North Shore Gas" on Exhibit B and "NSG" on Exhibit C);
- Dewatering activities (identified as "Dewatering" on **Exhibit C**);
- Filling and Capping (identified as "Filling/Capping" on Exhibit C);
- Ramp work (identified as "Ramp" on Exhibit B);
- General Site and Site Preparation Work (identified as "General Site" on Exhibit B and "Site Prep" on Exhibit C);
- Health and Safety Work (identified as "H&S" on Exhibit C);
- Drafting and execution of environmental covenants with numerous utilities (identified as "General Site" on Exhibit B and also contained in Exhibit D);
- Long term operations and maintenance ("O&M") of the vegetative soil barrier on Site 3 (identified on **Exhibit B**, Tables 4 and 5);
- Confirmatory soil sampling associated with excavations and clean corridors on Sites 3 and 6 (identified as heavy field work on **Exhibit B** and allocated into various Task Buckets);
- Mobilization and construction oversight (identified as "Engineering and RSE, Support Crew and Guardhouse" on Exhibit C); and
- Re-sampling of area on the South Side of Site 6 and concurrent limited soil removal (identified as heavy field work on **Exhibit B** and allocated into various Task Buckets).

2 JOHNS MANVILLE IMPLEMENTATION COSTS

2.1 Summary

The following presents a summary of the costs JM paid or will pay in connection with the work performed on the Sites under the RAWP. JM retained various vendors who generally performed three types of services with respect to the Sites: (1) "Professional Engineering Services"; (2) "Construction Services"; and (3) "Overall Support Services."

To align the services provided and costs incurred with the IPCB Order, I requested that Dr. Tatsuji Ebihara of AECOM, who has been involved with the Sites since 2007, and Mr. Dave Peterson of DMP PE, PC ("DMP"), the engineer overseeing the removal/construction implementation on the Sites since 2000, to complete the following tasks:

- Segregate costs incurred/invoiced on Site 3 from those incurred/invoiced on Site 6;
- Allocate the segregated costs into the various "Task Buckets" above.

This information is presented in **Exhibits B** and **C**.

2.1.1 Professional Engineering Services

From April of 2007 to July of 2017, Professional Engineering Services were being provided by several consulting firms including LFR/Arcadis (June 2008-2012) and AECOM (February 2012-present). Costs incurred for Professional Engineering Services generally related to planning for and implementing various investigations that took place on the Sites. After USEPA issued its EAM in November 2012, costs incurred for Professional Engineering Services generally related to disputing portions of the EAM, performing additional sampling required, and developing and implementing the RAWP. It is my understanding that JM incurred additional investigation costs prior to April of 2007, but that JM is not seeking to recover those costs in this action.

2.1.1.1 Costs for Past Professional Engineering Services

Table 1 of **Exhibit B** presents the costs JM incurred for Professional Engineering Services during each billing period and places them into corresponding Site 3 and Site 6 Task Buckets. For Professional Engineering Services, JM incurred costs of \$684,027 for work performed at Site 3 and \$679,593 for work performed at Site 6. This totals \$1,363,620.²

Weaver Consultants Group North Central, LLC

² The final columns of Table 1 present the cost allocations to the various Task Buckets, segregating them between Site 3 and Site 6. At the bottom of the table, the cost allocations are totaled. Most of the heavy

2.1.1.2 Estimated Completion Costs for Professional Engineering Services Rendered by AECOM

The work effort at Site 3 and Site 6 is not yet completed. Table 2 and Table 3 of **Exhibit B** present estimates of costs for future Professional Engineering Services for Site 3 and Site 6 ("Completion Costs"). These Completion Costs generally relate to AECOM and DMP work (which is not accounted for elsewhere) required by the RAWP that remains to be completed. Completion Costs for Professional Engineering Services, JM is estimated to incur \$80,621 for work performed at Site 3 and \$68,250 for work performed at Site 6.³ This totals \$148,871.

2.1.1.3 AECOM O&M Costs

Tables 4 and Table 5 of **Exhibit B** present an estimate of the costs anticipated to be incurred by JM for monitoring and performance of O&M activities over the 30-year post closure period required by the RAWP. Table 4 presents a projection of these future costs over 30-year period and Table 5 presents the same projected O&M costs on an annual basis. JM is expected to incur \$310,903 in O&M costs on Site 3 over the full 30-year post closure period (\$6,236.90 per year). No O&M costs are anticipated for Site 6.

2.1.2 Construction Services

Construction work began on the Sites around Summer/Fall 2015. Table 1 of **Exhibit C** presents the costs JM incurred for Construction Services and places them into corresponding Site 3 and Site 6 Task Buckets. For Constructions Services, JM incurred costs for work performed on both Site 3 and Site 6 totaling \$3,325,081.

field work costs involved confirmatory sampling. To allocate these costs into the different Task Buckets, I asked Dr. Ebihara to count all of the samples taken and then calculate the percentage of those samples associated with each Task. He then apportioned the invoiced amounts according to the percentage of samples associated with each Task Bucket. For instance, if 12% of the samples collected were for sampling along the Nicor Gas line on Site 3, 12% of the invoice amount was allocated to the Nicor Gas Task Bucket.

³ The costs presented on Tables 2 and 3 of **Exhibit B** are those associated with additional tasks needed to complete the RAWP implementation and are identified under the "Extended Cost" column. Examples of project tasks that remain to be completed include, but are not limited to, repair of cap erosion, site restoration for relocation of AT&T fiber optic lines, and performance of the final site survey.

⁴ Long-term O&M costs are generally associated with cap, vegetative cover, and fence monitoring and maintenance. In addition, consulting costs associated with overseeing and implementing these services have been included. The long-term costs were projected assuming an annual escalation factor, which is typically how future O&M costs are projected.

2.1.2.1 Costs for General Contracting Services Performed by Campanella & Sons

JM hired Campanella & Sons, Inc. ("Campanella") as the general contractor to implement the work required on Site 3 and Site 6 pursuant to the approved RAWP. Campanella was hired as the result of a competitive bid process that identified them as the low qualified bidder. Campanella's work was subdivided into two categories: (1) services included in the original bid documents ("Base Bid Services"); and (2) time and materials services ("T&M") that were outside the scope of the Base Bid Services. T&M costs were driven by requirements of USEPA regulators and/or the utility companies, and were identified after inception of the removal project.

The Base Bid Services costs are presented in Table 2 of **Exhibit C** and the T&M costs are presented in Table 3 of **Exhibit C.**⁵ For Campanella's Bid Base Services, JM incurred costs of \$776,068 for work performed at Site 3 and \$410,128 for work performed at Site 6. Additionally, JM incurred costs for health and safety support work performed by Campanella on both Sites in the amount of \$77,000. This totals \$1,263,196.

For Campanella's T&M services, JM incurred costs of \$233,880 related to work performed at Site 3 and \$263,834 related to work performed at Site 6. Additionally, JM incurred costs for work that related to both Site 3 and Site 6 in the amount of \$325,412. This totals \$823,126.

JM's costs for services performed by Campanella (Base Bid Services and T&M) total \$2,086,322.⁶

2.1.2.2 Costs for Site Management Services Rendered by DMP PE PC

DMP provided contractor management/supervision and engineering services at Site 3 and Site 6. Table 4 of **Exhibit C** presents the costs JM incurred for DMP's Site Management Services and places them into corresponding Site 3 and 6 Task Buckets. For DMP's Site Management Services, JM incurred costs of \$130,080 for Site 3, \$122,170 for Site 6, and \$297,490 for Site 3 and Site 6. This totals \$549,740.

⁵ The original base bid categorized major work elements as "Item 1.0 Site 3 Excavation and Capping," "Item 2.0 Site 6 Excavation and Filling," and "Health and Safety" (the latter services applicable to both Site 3 and Site 6). Table 2 of **Exhibit C** includes information on the bid form "Line #", the corresponding JM Purchase Order Item (JM PO Item), and a description of the individual major and minor work elements. The amounts invoiced to, and paid by, JM for each of the minor work elements is also included. Campanella's T&M costs are presented on Table 3 of **Exhibit C**.

⁶ Upon receipt of the DMP's cost allocations for Campanella, I took the additional step of segregating the Site 3 costs from the Site 6 costs so that I could subtotal certain costs by Task Buckets. The Campanella costs are presented on Tables 2 and 3 of **Exhibit C**.

⁷ Upon receipt of DMP's cost allocations for DMP services, I took the additional step of segregating the costs by Site 3 and Site 6 and then by placing all related tasks together so that I could subtotal costs by

2.1.2.3 Payments to Utilities and Fencing (Other Invoices)

Table 5 of **Exhibit C** reflects payments JM made to AT&T and North Shore Gas for the relocation/excavation work those entities performed on their utilities on the Sites. It also reflects costs JM incurred to install a fence, clear trees on Site 6, and pay the North Shore Water Reclamation District. JM's costs for Payments to Utilities and Fencing for Sites 3 and 6 total \$689,019.⁸

2.1.3 Costs for Legal Services by Walker Wilcox Matousek, LLP

JM retained Donald J. Manikas of Walker Wilcox Matousek, LLP to assist with non-litigation, legal support activities pertaining to the Sites. His work involved the preparation and negotiation of the various easement and other agreements to allow work in and around utilities. **Exhibit D** presents the costs JM incurred for Legal Services. JM's total costs for services performed by Mr. Manikas/Walker Wilcox Matousek with respect to Sites 3 and 6 total \$71,840.

2.1.4 Costs for USEPA Regulatory Oversight

JM was required to make several payments to USEPA associated with regulatory oversight of the removal activities at Site 3 and Site 6. JM's USEPA Oversight Costs for Site 3 are \$233,805. JM's USEPA Oversight Costs for Site 6 are \$125,675. This totals \$359,480.

2.1.5 Total Implementation Costs

In total, JM incurred \$5,579,794 in Implementation Costs. The following table presents a summary of the Implementation Costs:

Task Bucket. The sorted version of the cost allocation is included as **Exhibit C**. The DMP costs are presented on Table 4 of **Exhibit C**.

⁸ The total presented here is adjusted to remove costs associated with Site 4/5 shown under North Shore Gas (NSG) on Table 5 of **Exhibit C**.

Service	Service Provider	Site 3	Site 6	Site 3 and Site 6	Total
Professional - Engineering	LFR/Arcadis/ AECOM	\$684,027	\$679,593	\$0	\$1,363,620
Professional - Completion	AECOM Completion Costs	\$80,621	\$68,250	\$0	\$148,871
Professional - O&M	AECOM Operations and Maintenance	\$310,903	\$0	\$0	\$310,903
Construction - Base Bid	Campanella	\$776,068	\$410,128	\$77,000	\$1,263,196
Construction - T&M	Campanella	\$233,880	\$263,834	\$325,412	\$823,126
Construction - Management	DMP PE PC	\$130,080	\$122,170	\$297,490	\$549,740
Construction – Misc.	Various	\$57,362	\$102,082	\$0	\$159,444
Payments to Utilities	AT&T, NSWRD, NSG	\$136,243	\$393,331	\$0	\$529,574
Legal Services	Donald J. Manikas	\$0	\$0	\$71,840	\$71,840
Regulatory Oversight	EPA	\$233,805	\$125,675	\$0	\$359,480
Total		\$2,642,989	\$2,165,063	\$771,742	\$5,579,794

2.2 Cost Review and Reasonableness

I have reviewed the Implementation Costs and their supporting documentation to assess their accuracy, reasonableness, and payment status.

2.2.1 Accuracy of Invoices and Allocations

Over the removal project's ten-year time period, various consultants and contractors generated more than 500 invoices covering and evidencing the work performed. Based upon review of the invoices, summary tables, and interviews with Dr. Ebihara and Mr. Peterson, and review of deposition transcripts for Dr. Ebihara, Mr. Peterson, and Campanella, it is my opinion that the **Exhibits B** and **C** to this Report: (1) accurately depict JM's Implementation Costs incurred on Sites 3 and 6; (2) accurately segregate those Implementation Costs by Site 3 or Site 6;⁹ and (3) accurately allocate those Implementation Costs by Task Bucket.

2.2.2 Project Management and Reasonableness of Implementation Costs

In my expert opinion, I believe that the Implementation Costs JM incurred are reasonable. I believe this to be true based on several considerations, including the following:

- Campanella was selected as the contractor based on a comprehensive, competitive bid process. Campanella was the low bidder of three bids that were submitted for the work.
- The unit rates charged are competitive with local market conditions.
- JM tasked its Project Supervisor (Frederick Scott Myers) to review and approve every invoice before it was paid. 10
- JM performed an internal audit of the removal work and found no irregularities with respect to the bidding process, costs, or invoicing for the project. 11
- JM required its vendors to provide detailed invoices. These invoices were also reviewed by Mr. Peterson for accuracy and consistency before being sent to JM for review and payment.
- JM disputed the remedy imposed by USEPA and ultimately convinced USEPA to agree to certain modifications that reduced JM's Implementation Costs. These JM-proposed modifications included, but were not limited to: (1) discharging water generated from dewatering activities to the North Shore Water Reclamation District rather incurring substantially greater costs for hauling the

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⁹ For a period of time, JM's consultants were issuing invoices for services that jointly covered both Site 4/5 and Site 6. At my request, Dr. Ebihara removed these costs from these invoices (**Exhibit B**). In the "Invoice Total Site 6" column of Table 1 of **Exhibit B**, he shows which expenses from the combined Site 4/5 and Site 6 work that are associated solely with the work performed on Site 6.

¹⁰ Deposition of Frederick Scott Myers, June 29, 2017, pages 66 through 70.

 $^{^{\}rm 11}$ Deposition of Frederick Scott Myers, June 29, 2017, pages 66 through 70.

water to an offsite treatment facility; (2) landfilling materials excavated from the Sites on JM property as opposed to incurring substantially increased costs for transportation and disposal at an approved offsite location; and (3) avoiding the replacement of certain utility lines by abandoning them in place (City of Waukegan Water Line, NSG line). Because of these modifications, JM was ultimately able to reduce its Implementation Costs by several million dollars.

- Construction Services were generally done in accordance with the anticipated schedule, which minimized unexpected costs and cost overruns.
- Construction Services were managed in a manner consistent with standard industry practices. This included having regular construction meetings and preparation of daily field reports. The progress of construction was also documented daily through hundreds of photographs.

2.2.3 Costs Paid

To verify whether the Implementation Costs reflected on **Exhibits B** and **C** have been paid, I reviewed JM payment records for the Sites and spoke with Dr. Ebihara, Mr. Peterson, and Mr. Myers. The payment records provided by JM are attached as **Exhibit E**. Implementation Costs reflected on **Exhibits B** and **C** have been paid by JM except for the following costs that relate to future work, which I reasonably believe will be paid: (1) \$148,871 in estimated Completion Costs for Professional Engineering Services to be rendered by AECOM with support from DMP; and (2) \$310,903 in future O&M Costs.

This is consistent with information provided by Dr. Ebihara, Mr. Peterson, and Mr. Myers. These individuals are not aware of any invoices that remain unpaid for Professional Engineering Services or Construction Services.

All Walker Wilcox Matousek invoices have been paid in full.¹² JM has also paid all outstanding USEPA Oversight Costs.¹³ I am not aware of any liens filed against the Sites (or larger property) for unpaid work completed by contractors providing services for the project. Based on communications with Scott Myers of JM, it is my understanding JM has established an environmental reserve for future costs related to work on Site 3 and Site 6. Given that JM has to date paid all invoices due in full, and the availability of a financial reserve for payment of future costs, it is my expectation and opinion that, as it has in the past, JM will pay future invoices in a timely fashion.

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¹² Deposition of Donald Manikas.

¹³ Deposition of Brent Tracy.

3 IDOT COST ATTRIBUTION

3.1 Summary

After tabulating the Implementation Costs, determining which Implementation Costs pertained to Site 3 and/or Site 6, and allocating the Implementation Costs to the Task Buckets, I had to determine how best to align the Task Buckets (which represent a portion of required work and associated Implementation Costs) to the Board's finding of liability, which focused on boring locations.

The first step in this process was to define the geographic extent of IDOT's liability (the "IDOT Areas of Liability") based upon the IPCB Order and the record. I then overlaid on a figure (see **Figure 2**) the location of visual ACM observed during historic investigations. This figure helps to demonstrate that most of the visual ACM observed is located within IDOT Areas of Liability. Thereafter, I evaluated each Task Bucket to determine whether the IDOT Areas of Liability caused JM to incur the Implementation Costs associated with the work in that Task Bucket.

3.1.1 The IDOT Areas of Liability

The Board identified the areas of the Sites for which IDOT is liable by sample locations. Samples were taken every 50 feet. In other words, each sample represents a 50 foot by 50 foot grid.

3.1.1.1 IDOT Site 3 Area of Liability

For Site 3, the Board found IDOT liable for contamination within Parcel No. 0393 due to IDOT's interest in and control of this parcel as well as because of IDOT's burial of ACM within certain sample grids on Site 3, namely B3-25, B3-15, B3-16, B3-50 and B3-45.

As a result, Implementation Costs JM incurred for any and all work within Parcel No. 0393 and any and all work associated with and/or caused by contamination in sample grids of B3-25, B3-15, B3-16, B3-50 and B3-45 should be attributable to IDOT. I refer to these areas as the "Site 3 Area of Liability."

3.1.1.2 IDOT Site 6 Area of Liability

For Site 6, the Board found IDOT liable for contamination on the South Side of Site 6 in the areas of 1S to 4S because IDOT buried ACM waste in these locations while reconstructing Greenwood Avenue during the Amstutz Project.

Based upon interviews with Mr. Peterson and a review of photographs taken during remedy implementation, it is my opinion that IDOT buried the ACM from 5S to 8S at the same time that it buried that ACM from 1S to 4S. According to Mr. Peterson, who

personally witnessed the excavation work in this area (which occurred after the first hearing in this case), it was apparent at the time of the excavation that the ACM placed at areas 1S-4S was placed at the same time as the ACM was placed at 5S–8S.

As Mr. Peterson indicated and the construction photographs demonstrate, Campanella excavated to at least elevation 584 at areas 1S-8S and found a consistent seam of the same type of ACM materials (Transite pipe, sludge, and roofing paper) along this entire transect (1S-8S) from the ground surface to a depth of approximately 3 to 5 feet below ground surface. Therefore, based upon this new evidence, it is my opinion that IDOT buried the ACM at 5S to 8S when it buried the ACM from 1S to 4S.

This conclusion is further supported by the soils encountered from 5S to 8S. Mr. Peterson reports that the ACM was encountered within fill materials. But that should be the case only if IDOT buried ACM in that location during the Amstutz Project. According to the pre-Amstutz engineering drawings, the soil in this area should have contained a layer of black cindery fill or black peat (Hearing Exhibit 21-A-26), not ACM. The absence of such material in conjunction with the existence of ACM (of the same type as found at 1S-4S and in a consistent seam with the ACM found at 1S-4S) indicates that IDOT removed the black cindery fill/black peat in the 1970s and replaced it with ACM during the Amstutz Project. As a result, Implementation Costs JM incurred for any and all work associated with and/or caused by contamination in sample grids 1S-8S should be attributable to IDOT. I refer to these areas, 1S-8S, as the "Site 6 Area of Liability."

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¹⁴ See also Figures 3 and 4 attached to this report. Figure 3 aligns the engineering drawing for Detour Road A (Hearing Exhibit 21-A-23) with Site 6 sample locations. The engineering drawing shows that IDOT's work along Detour Road A extended to Station 15 (the Stationing used for Detour Road A), which is near Test Pit 7S. It also shows Detour Road A intersecting with Greenwood at areas 6S and 7S. Finally, it shows that fill was needed along Detour Road A from at least Detour Road A Station 8 to Detour Road A Station 15. This indicates that IDOT used fill at both areas 6S and 7S to raise the ground level to the proposed grade of 589.7. Figure 4 aligns the engineering drawings for Detour Road A (Hearing Exhibit 21A-23) and for Greenwood (Hearing Exhibit 21-A-26) with the same sample locations. It shows that, according to the engineering drawings (Hearing Exhibit 21-A-26), "black cindery fill" or unsuitable peat existed immediately below Test Pits 4S, 5S, 6S and 7S (which are between Greenwood Stations 6 and 8), which needed to be removed down to elevation 584 to 584.5. Thereafter, per the drawing, fill was to be added up to elevation 590 at areas 4S, 5S, 6S, 7S and extending to 8S (Hearing Exhibit 21-A-26; see also Hearing Exhibits 06-28; 164/202-1 (for 7S stationing)). Both the cross section for Detour Road A and the cross section for Greenwood indicate that IDOT used fill material at areas 5S, 6S, 7S and at part of area 8S. See also Hearing Exhibits 84 and 164/202 (as to area 7S), showing that ACM located at areas 5S, 6S and 7S fall within the fill zone depicted on the Figures -- elevations of 584 and 589. Test Pit 5S contained ACM between 585.75 and 588.75 (see actual elevation numbers along top of Exhibit 84), Test Pit 6S contained ACM between 585.63 and 588.63, Test Pit 7S contained ACM between 584.94 and 587.94, and Test Pit 8 contained ACM between 587.60 to 588.60.

3.2 Attribution Approach

After defining the IDOT Areas of Liability, I evaluated each Task Bucket to determine whether the IDOT Areas of Liability caused JM to incur the Implementation Costs associated with the work in that Task Bucket. My findings are set forth in **Exhibit F.** The basis for assigning Cost Attribution to IDOT is provided in the following subsections of this Report. Based upon the analysis, it is my opinion that IDOT is responsible for \$3,274,917 of JM's \$5,579,794 total Implementation Costs.

3.2.1.1 Nicor Gas

The RAWP required that a clean corridor be constructed for the Nicor Gas line that runs through Site 3. The Nicor Gas Line is depicted on **Figure 1**. Figure 1 shows that all the work done to create the Nicor Gas clean corridor occurred outside of, and was unrelated to, any IDOT Area of Liability. Therefore, none of the costs incurred in creating a clean corridor around the Nicor Gas line (\$218,090) are attributable to IDOT.

3.2.1.2 City of Waukegan Water Line

The RAWP required that a clean corridor be constructed for the City of Waukegan Water Line, the location of which is depicted in part on **Figure 1**. The Implementation Costs incurred for the City of Waukegan Water Line include:

Service	Site 3	Site 6
Professional - Engineering Related to Water Line	\$35,867	\$48,433
Construction – Base Bid Related to Water Line	\$25,170	
Construction – T&M		\$38,241

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¹⁵ At the time of the first hearing in this case in May and June of 2016, it was thought that a substantial portion of the City of Waukegan Water line was located south of Parcel No. 0393. However, attempts by Campanella to locate the line after the hearing at that location were unsuccessful. In August of 2016, the line was finally located. In the prior hearing, there was testimony provided indicating that IDOT had moved the line during the Amstutz Project. Consistent with this testimony, as to Site 3, the line was found to be completely within Parcel No. 0393 (as shown on **Figure 1**). The actual location of the water main has been presented on an updated survey of the Site performed in June of 2017, which is included as **Exhibit G**. As depicted on **Exhibit G**, the City of Waukegan Water Line enters Site 3 from the northern portion of its western boundary. It then traverses east through Parcel No. 0393, before taking a 90-degree bend to the north where it crosses under E. Greenwood Avenue.

Service	Site 3	Site 6
Related to Water Line		
Total	\$61,037	\$86,674
IDOT Attribution	\$61,037	\$0

3.2.1.2.1 Site 3

The entire length of the water main located on Site 3 runs within Parcel No. 0393 (see **Figure 1**), a Site 3 Area of Liability. As a result, all costs associated with the City of Waukegan Water Line work on Site 3 are attributable to IDOT.

3.2.1.2.2 Site 6

On Site 6, the City of Waukegan Water Line is only present on the north side of Greenwood and outside any IDOT Area of Liability (see **Figure 1**). Therefore, I did not attribute any Site 6 City of Waukegan Water Line costs to IDOT.

As shown in **Exhibit F**, the portion of JM's Implementation Costs for work performed in constructing a clean corridor for the City of Waukegan Water Line that is attributable to IDOT is \$61,037.

3.2.1.3 AT&T

AT&T had several telephone lines and a fiber optic line (the locations of which are depicted on **Figure 1**) that traversed portions of both Site 3 and Site 6. Each of these lines was abandoned with new service lines rerouted and temporarily installed on overhead utility poles bordering the southern boundary of the main JM facility on the north side of Greenwood. In some instances, the lines were physically removed when the surrounding soils were being excavated. Because of the way the work was invoiced (not broken down between the north and south side of Site 6) and the way the Board structured its IPCB Order (based on sample locations), I attributed the related Implementation Costs based upon the number of AT&T lines that run through the IDOT Areas of Liability.

The lines located on Site 3 and Site 6 include:

- 1. Three AT&T telephone lines located on Site 3. Two of these three lines travelled within Parcel No. 0393, a Site 3 Area of Liability. The third travelled from the southwestern boundary of Parcel No. 0393 in a southeasterly direction across Site 3. I concluded that this line did not fall within a Site 3 Area of Liability.
- 2. Two AT&T telephone lines were located on Site 6, one on the south side of Site 6 and one on the north side of Site 6. The one on the south side of Site 6 runs

- through approximate boring locations 4S to 8S, which includes the Site 6 Area of Liability.
- 3. One AT&T fiber optic cable was located on the north side of Site 6, outside any IDOT Area of Liability.

Implementation Costs related to AT&T were incurred by JM in the form of a payment to AT&T (see Payments to Utilities) for abandoning and relocating these lines and a portion of Professional Engineering and Construction Services. Examples of the work performed include, but are not limited to: work plan preparation, utility pole installation, placement of a barrier wall, excavation of access holes on Greenwood Avenue, and backfilling of AT&T excavations. Because much of the construction work overlapped between Site 3 and Site 6, it was categorized on **Exhibit C** as both Site 3 and Site 6 work. The Implementation Costs incurred include:

Service	Site 3	Site 6	Sites 3 and 6
Professional - Engineering Related to AT&T	\$26,524	\$31,105	
Professional - Completion Related to AT&T		\$15,000	
Construction – T&M Related to AT&T			\$53,548
Construction— Management Related to AT&T			\$45,350
Utility Payment to AT&T	\$82,127	\$238,161	
Total	\$108,651	\$284,266	\$98,898
IDOT Attribution	\$71,710	\$88,858	\$40,449

3.2.1.3.1 Site 3

On Site 3, since two of the three abandoned telephone lines run within the Site 3 Area of Liability, I attributed 66% of JM's Site 3 AT&T costs to IDOT. This totals \$71,710.

3.2.1.3.2 Site 6

On Site 6, there is one AT&T phone line and one fiber optic line on the north side of Site 6 and one telephone line traversing the south side of Site 6 and running through the Site 6 Area of Liability. As shown on **Exhibit F**, Professional Engineering Services – Completion Costs of \$15,000 were excluded from the IDOT allocation since they are projected costs for the AT&T fiber optic line located on the north side of Site 6. As a result, I attributed 33% of JM's costs for abandoning the AT&T lines on Site 6 to IDOT. This totals \$88,858.

3.2.1.3.3 Site 3 and 6

To determine the percentage of costs for Construction Services for AT&T line work that could not be segregated to Site 3 or Site 6 alone, I divided the portion of costs I determined were attributable to IDOT (\$160,568) by the total Site 3 and 6 costs for AT&T work (\$392,918). I then applied this percentage, 40.9% (160,568/392,918), to the costs for Construction Services on Combined Sites 3 and 6 as follows:

\$53,548 (Campanella T&M costs) * .409 = \$21,901

\$45,350 (DMP costs) * .409 = \$18,548

The total costs I attributed to IDOT for AT&T work on Combined Site 3 and Site 6 is \$40,449 (\$21,901 + \$18,548).

As shown in **Exhibit F**, and summarized in the above table, the portion of JM's costs for AT&T work performed attributable to IDOT is \$201,017.

3.2.1.4 Utility/ACM Soils Excavation

Pursuant to the EAM, soils contaminated with ACM were required to be excavated and removed from the north and south sides of Site 6 around utilities. As part of this effort, certain utility lines located within these areas were excavated and removed (e.g., ComEd fiber optic and electrical lines located on the south side of Site 6). Consistent with the method used above, I determined the Implementation Costs associated with the soil removal around these lines on the north and south side of 6. The Implementation Costs incurred are shown within **Exhibit F** and include:

Service	Site 3	Site 6	Sites 3 and 6
Construction – Base Bid Soils for Site 6		\$155,318	
Total		\$155,318	

Service	Site 3	Site 6	Sites 3 and 6
IDOT Attribution		\$77,659	

Excavation of ACM impacted soils occurred on both the north and south sides of Site 6. As shown on **Figure 1**, eight utility lines in total were present on the north and south sides of Site 6 including:

- 1. City of Waukegan Water Line (north side only)
- 2. North Shore Gas line (north and south side same line)
- 3. AT&T phone lines (one line on north, one on south)
- 4. AT&T fiber optic line (one line on north)
- 5. ComEd fiber optic line (one line on north, one on south)
- 6. ComEd electric line (south side only)

Four of the eight utility lines were located on the south side of Site 6 (AT&T phone, North Shore Gas, ComEd electric, and ComEd fiber optic) and ran through the Site 6 Area of Liability. Consequently, I have attributed 50% (4/8) of JM's total costs for excavation of ACM impacted soils on Site 6 to IDOT. This totals \$77,659 (\$155,318 * .50).

3.2.1.5 Northeast Excavation

The location of the Northeast Excavation ("NE Excavation") is depicted on **Figure 1**. At this location, the RAWP required that a 145 foot by 40 foot area be excavated to a depth of three to five feet and backfilled with clean material. A portion of the ComEd fiber optic line, which runs through 1S-4S, B3-50 and B3-45 also runs through the NE Excavation. The Implementation Costs incurred include:

Service	Site 3	Site 6	Sites 3 and 6
Professional - Engineering for Northeast Excavation	\$3,977		
Professional – Completion Costs for Northeast Excavation	\$10,000		
Construction – Base Bid for Northeast	\$35,957		

Service	Site 3	Site 6	Sites 3 and 6
Excavation			
Total	\$49,934		
IDOT Attribution	\$49,934		

The NE Excavation involves the Site 3 Area of Liability. As a result, I have allocated 100% of the costs associated with the NE Excavation as being attributable to the IDOT Site 3 and Site 6 Areas of Liability. ¹⁶ This totals \$49,934.

3.2.1.6 North Shore Gas

The EAM required a clean corridor for the entire North Shore Gas ("NSG") line on Sites 3 and 6, the location of which is depicted on **Figure 1**. However, it was later decided that instead of creating a clean corridor for the entire line, much of the line would be removed. The portion of the NSG line on Site 3 was kept in place and a clean corridor was created around it. The line was capped at 4S and the portion of the line on the south side of Site 6 running east of 4S was removed. The Implementation Costs incurred are shown within **Exhibit F** and include:

Service	Site 3	Site 6	Sites 3 and 6
Professional - Engineering for North Shore Gas	\$135,159	\$81,028	
Construction - T&M for North Shore Gas	\$162,678		\$22,327
Construction – Management for North Shore Gas			\$35,830
Utility Payment to North Shore Gas ¹⁷	\$34,687	\$153,833	

¹⁶ In the field, JM was required to excavate to five feet in the northwest portion of the NE Excavation (around sample location B3-50 and B3-45) and 4 feet in the other areas.

¹⁷ Per Table 5 of Exhibit C, JM made total payments to NSG of \$188,521 (this excludes tabulated costs for Site 4/5). Per calculations performed by Dr. Ebihara, a total of 2458 lineal feet of NSG line was abandoned

Service	Site 3	Site 6	Sites 3 and 6
Total	\$332,524	\$234,861	\$58,157
IDOT Attribution	\$332,524	\$65,597	\$40,826

3.2.1.6.1 Site 3

On Site 3, the NSG line runs through a portion of Parcel No. 0393 as well as borings B3-15 and B3-50, all Site 3 Areas of Liability. As a result, all Site 3 NSG costs are attributable to IDOT. This totals \$332,524.

3.2.1.6.2 Site 6

On Site 6, the capping of the clean corridor occurred within the Site 6 Area of Liability at area 4S. As a result, all capping of the NSG line on Site 6, which was limited to the area around 4S, is attributable to IDOT.

ACM was found on the north side of Site 6 near the NSG line. Because this work occurred on the north side of Site 6 and was not reasonably connected to any IDOT Area of Liability, as explained below, I did not attribute any of these costs to IDOT.

ACM was found on the south side of Site 6 near the NSG line. At the time of the EAM, there was no ACM found east of 8S. Nonetheless, USEPA required a clean corridor for the entire line from 4S and moving east, notwithstanding whether ACM had been found along those sections of the line.¹⁸ Thus, the ACM within the IDOT Area of Liability drove the need to create the entire clean corridor for NSG along the south side of site 6.

It is my understanding that a total of 2005 lineal feet of the NSG line was removed on Site 6. Of this 2005 lineal feet, 560 feet (27.9% of the NSG line that was removed) was located on the south side of Site 6. Therefore, I have attributed 27.9% of JM's Implementation Costs for removal of the NSG line on Site 6 to IDOT. This totals \$65,597

on Site 3 and Site 6. Of this total, 453 feet were located on Site 3 (18.4%), and 2,005 feet were located on Site 6 (81.6%). Therefore, the total NSG payments were allocated between Site 3 and Site 6 using these percentages.

¹⁸ See EAM at Hearing Exhibit 65-16 (requiring excavation of "clean corridors" for all utilities); see also correspondence dated December 20, 2012 from Bryan Cave to USEPA Re: Notice of Dispute Concerning Enforcement Action Memorandum dated November 30, 2012, Page 7 and Page 10 (pointing out that instead of focusing on limited excavation and capping, USEPA was requiring the creation of 25-foot clean corridors for all buried utilities on the Sites, "regardless of whether impacts from ACM were noted in the overlying soil during the assessment.")

(\$234,861 * .279). These costs do not include the JM Implementation Costs for excavation and removal of ACM impacted soils as presented in Section 3.2.1.4.

3.2.1.6.3 Site 3 and 6

Certain Campanella T&M construction costs and DMP construction costs incurred for the NSG line were categorized as applying to both Site 3 and Site 6. These costs include work necessary to access the pipe and valve installation location and general construction management. JM incurred total costs of \$58,157 for work performed by Campanella and DMP.

To determine the percentage of costs for NSG line work that could not be segregated to Site 3 or Site 6 alone, I divided the portion of costs I determined were attributable to IDOT (\$398,121) by the total Site 3 and 6 costs for NSG work (\$567,385). I then applied this percentage, 70.2%, to the costs for NSG line work on Combined Sites 3 and 6 (\$58,157 * .702). The total costs I attributed to IDOT for NSG work on Combined Site 3 and Site 6 is \$40,826.

Based upon the above, JM's costs for the NSG line that are attributable to IDOT total \$438,947.

3.2.1.7 Dewatering

Dewatering was undertaken to support various construction activities that occurred during implementation of the RAWP. Dewatering was necessary owing to the high water table and number of excavations needed on both Site 3 and Site 6 to accommodate work predominantly relating to the clean corridor construction for the Nicor line, NSG line, City of Waukegan Water Line, and the NE Excavation. The Implementation Costs incurred are shown within **Exhibit F** and include:

Service	Site 3	Site 6	Sites 3 and 6
Construction – Base Bid for Dewatering	\$140,800	\$159,250	
Construction – T&M for Dewatering	\$24,325		\$17,675
Construction – Management for Dewatering	\$74,530		\$21,500
Construction Services – Payments to	\$19,429	\$1,337	

Service	Site 3	Site 6	Sites 3 and 6
Utilities			
Total	\$259,084	\$160,587	\$39,175
IDOT Attribution	\$217,803	\$79,625	\$27,775

My approach for attributing the costs associated with dewatering to IDOT was to consider the other activities during the removal action that dewatering supported.

3.2.1.7.1 Site 3

For Site 3, under the Campanella Base Bid, dewatering was needed to allow for construction of the clean corridors for the Nicor line, the NSG line, the City of Waukegan Water Line, and the NE Excavation. I have previously determined that 100% of the costs for construction of three clean corridors (City of Waukegan Water Line on Site 3, NSG line on Site 3, and NE Excavation on Site 3) were attributable to IDOT. I also determined that IDOT had no responsibility for the costs of construction for one clean corridor (Nicor Gas line). I therefore attributed 75% (3/4) of the Base Bid dewatering costs to IDOT. This totals \$105,600.

JM also incurred costs for Campanella T&M dewatering services associated with construction of a water line that allowed for water to be moved from Site 3 under E. Greenwood Avenue for discharge to the North Shore Sanitary District sewer line. These costs totaled \$24,325. I applied the same percentage (75%) to T&M dewatering costs to determine the portion of costs attributable to IDOT. This totals \$18,244.

DMP provided Construction Management services for the dewatering activities on Site 3. Based upon the work it performed, DMP assigned 100% of its construction management costs for Site 3 to the work associated with dewatering for the NSG clean corridor construction. According to Mr. Peterson, these dewatering management costs were related to work required to install a valve for NSG near the western boundary of Site 3. As demonstrated above, 100% of the costs associated with Site 3 NSG clean corridor construction activities on Site 3 are attributable to IDOT. Therefore, 100% of the Construction Management costs have been allocated to IDOT. This totals \$74,530.

DMP also incurred expenses associated with discharge of water generated from dewatering activities to the North Shore Water Reclamation District (water discharge fees). DMP incurred total costs of \$20,766 (categorized above as Construction Costs –

Payments to Utilities). Of these total fees, \$19,429 were for dewatering associated with the Site 3 and have been allocated to IDOT. 19

Based upon the above, JM's costs for dewatering activities on Site 3 that are attributable to IDOT total \$217,803.

3.2.1.7.2 Site 6

Campanella's Base Bid Services included work necessary to provide dewatering for clean corridor construction and soil removal work on both the north and south sides of Site 6. JM incurred total costs of \$159,250 for Campanella's work. Based upon conversations with Mr. Peterson, I determined that the level of effort for these activities would be relatively the same for work on the north side of Site 6 as for work on the south side of Site 6. The dewatering work associated with the south side of Site 6 was concentrated from between 1S to approximately 9S. The excavation was deeper within this area resulting in the need to dewater. East of 9S, dewatering was not needed. Because the Site 6 IDOT Area of Liability caused this work, I attributed these costs to IDOT. I therefore attributed to IDOT 50% of JM's total costs for Campanella's dewatering services associated with the south side of Site 6. This totals \$79,625.

In addition, DMP incurred (see footnote 20), \$1,337 associated with discharge fees from the North Shore Water Reclamation District. Since these fees were associated with dewatering discharges from the north side of Site 6, they have not been allocated to IDOT.

3.2.1.7.3 Site 3 and 6

DMP allocated certain costs associated with dewatering activities to both Site 3 and Site 6. These included \$17,675 in costs incurred by JM for Campanella's T&M Services, and \$21,500 in costs for DMP's Construction Management (see Tables 3 and 4 of **Exhibit C**).

To determine the percentage of costs for dewatering work that could not be segregated to Site 3 or Site 6 alone, I divided the portion of costs I determined were attributable to

¹⁹ Costs are presented on Table 5 of **Exhibit C**. JM incurred a total of \$20,766 in expenses for dewatering discharges to the North Shore Water Reclamation District. Per information provided by Mr. Peterson, all of the expenses incurred in the month of June 2016 (\$10,898) were for dewatering associated with the valve installation for the NSG line. Therefore, these expenses were allocated to Site 3, and therefore 100% of these costs were allocated to IDOT. July expenses were for NSG dewatering that took place on the north side of Site 6, therefore none of these costs were allocated to IDOT. For August, NSG dewatering that occurred between August 1 and August 5 were for the north side of Site 6. From August 6 to August 31, NSG dewatering was undertaken for work on Site 3. During the month of August, a total of 8,011,349 gallons were dewatered and discharged to NSWRD. For the period of August 1 to August 5, 659,525 gallons (8.2% of total) were discharged associated with dewatering on the north side of Site 6. The balance, 7,351,824 gallons (91.8%) was for NSG dewatering on Site 3. Therefore, 100% of June expenses (\$10,898) and 91.8% of the August expenses (\$8,531) were allocated to IDOT for work NSG dewatering work on Site 3 (total \$19,429).

IDOT (\$297,428) by the total Site 3 and 6 costs for dewatering work (\$419,671). I then applied this percentage (70.9%), to the costs for dewatering work on Combined Sites 3 and 6 (\$39,175*.709). The total costs I attributed to IDOT for dewatering on Combined Site 3 and Site 6 is \$27,775.

Based upon the above, JM's costs for dewatering and that are attributable to IDOT total \$325,203.

3.2.1.8 Filling/Capping

The EAM and RAWP required that a vegetative soil cover (cap) be installed across Site 3. The cap is comprised of a six-inch layer of sand overlain by 15 inches of compacted clay, overlain by a minimum of 3 inches of topsoil to support a vegetative cover. The cap was required to include a geotextile placed between the base sand layer and overlying compacted clay.

The Filling/Capping costs also cover the removal of soils from both the north and south sides of Site 6. The Implementation Costs incurred are shown within **Exhibit F** and include:

Service	Site 3	Site 6	Sites 3 and 6
Construction – Base Bid for Filling/Capping	\$328,983		
Construction – T&M for Filling/Capping	\$41,721	\$188,183	\$231,862
Construction – Management for Filling/Capping	\$55,550	\$122,170	\$120,150
Total	\$426,254	\$310,353	\$352,012
IDOT Attribution	\$341,003	\$155,177	\$237,256

3.2.1.8.1 Site 3

My approach for allocating the costs associated with Filling/Capping for Site 3 was to consider what drove the requirement for the cap to be constructed across Site 3. There were five Task Buckets applicable to Site 3 that drove the need for a cap. As discussed above, four of these five Task Buckets (City of Waukegan Water Line, NSG, AT&T, NE

Excavation (which included the ComEd Fiber Optic Cable)) were caused by the ACM contamination within the IDOT Site 3 Areas of Liability and therefore are attributable to IDOT. I also found that none of the costs for one of these Five Task Buckets (Nicor Gas) were attributable to IDOT. As a result, I allocated 80% (4/5) of JM's Site 3 cap costs to IDOT. This totals \$341,003.

3.2.1.8.2 Site 6

Site 6 Filling/Capping (placement of vegetative layer) occurred on both the north side of Site 6 as well as the south side of Site 6. As discussed in Section 3.2.1.4, eight utility lines in total were present on the north and south sides of Site 6. Four of the eight utility lines are located on the south side of Site 6. Consequently, consistent with my attribution approach for the Utility/ACM Excavation Task Basket (see Section 3.2.1.4 above), I have attributed 50% (4/8) of JM's total costs for filling and capping on Site 6 to IDOT. This totals \$155,177.

3.2.1.8.3 Site 3 and 6

DMP allocated certain costs associated with Filling/Capping activities to both Site 3 and Site 6. These included \$231,862 in costs incurred by JM for Campanella's T&M Services and \$120,150 in costs for DMP's Construction Management. To determine the percentage of costs for Filling/Capping that could not be segregated to Site 3 or Site 6 alone, I divided the portion of costs I determined were attributable to IDOT (\$496,180) by the total Site 3 and 6 costs for filling/capping work (\$736,607). I then applied this percentage, 67.4%, to the costs for filling/capping work on Combined Sites 3 and 6 (\$352,012 * .674). The total costs I attributed to IDOT for filling/capping on Combined Site 3 and Site 6 is \$237,256.

Based upon the above, JM's costs for Filling/Capping and that are attributable to IDOT total \$733,436.

3.2.1.9 Ramp

Owing to the steep slopes of the E. Greenwood Avenue embankment, located on Parcel No. 0393, AECOM and USEPA deemed it impracticable to install the required vegetative cap over parts of the embankment. AECOM undertook sampling of a portion of the embankment to demonstrate that a cap would not be needed for these areas. Since these costs, as shown on **Exhibit F**, were incurred for work entirely within the Site 3 Area of Liability, 100% of JM's costs are attributable to IDOT. This totals \$20,880.

3.2.1.10 General Site/Site Preparation

General Site/Site Preparation (Site Preparation) activities encompass a range of services that relate to general implementation of the work on Site 3 and Site 6. Examples include, but are not limited to, general project management, support to and interface

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with regulatory authorities, professional services oversight of construction work performed at the Sites, future O&M costs, surveying support for construction activities, installation and maintenance of stormwater controls, traffic control, and clearing and grubbing the sites in preparation for construction. These tasks were unable to be allocated to a specific Task Bucket as otherwise identified herein.

The Implementation Costs incurred are shown within **Exhibit F** and include:

Service	Site 3	Site 6	Sites 3 and 6
Professional - Engineering	\$355,534	\$519,027	
Professional - Completion Costs	\$70,621	\$53,250	
Professional – O&M	\$310,903		
Construction - Base Bid	\$138,310	\$95,560	
Construction-T&M		\$37,410	
Construction– Management			\$74,300
Construction – Misc.	\$57,362	\$102,082	
Total	\$932,730	\$807,329	\$74,300
IDOT Attribution	\$710,118	\$305,978	\$46,883

3.2.1.10.1 Site 3

JM incurred \$355,534 in costs for Site Preparation Professional Engineering Services rendered by LFR, Arcadis, and AECOM for Site 3. To determine the percentage of Site Preparation Professional Engineering Services that are attributable to IDOT, I divided the portion of Site 3 costs for Construction Services that I determined were attributable to IDOT (\$1,094,891), by the Site 3 costs for Construction Services (\$1,476,454). I then applied this percentage (74.2%) to the costs for Site Preparation Professional Engineering Services on Site 3. The total costs I attributed to IDOT for Site Preparation Professional Engineering Services on Site 3 is \$263,806.

Site Preparation Professional Engineering Services - Completion Costs for Site 3 generally include costs for services for Project Management, Regulatory Support, and AECOM Oversight (see Table 2 of **Exhibit B**). Services include, but are not limited to, general regulatory support, performance of the final site survey, preparation of the USEPA-required Completion Report, and finalization of the Completion Report based

upon USEPA comments. Costs for these services are projected to total approximately \$70,621. To calculate the portion of these costs attributable to IDOT, I used the same rationale and applied the same percentage as above (74.2%) to JM's total Site Preparation Professional Engineering Services – Completion Costs for Site 3. This totals \$52,401.

AECOM projects that, over the next 30 years, JM will incur approximately \$310,903 in costs for O&M of the vegetative cap installed on Site 3 (see Table 4 of **Exhibit B**), which is required pursuant to the USEPA-approved RAWP. Since the O&M costs relate primarily to the vegetative cap installed on Site 3, I applied the same factor (80%) used for the Filling/Capping Task Bucket to calculate the portion of these costs attributable to IDOT. This totals \$248,722.

Campanella's base bid included Site Preparation work on Site 3. These services include, but are not limited to, surveying, construction of stormwater controls, installation of traffic controls, and clearing and grubbing (see Table 2 of **Exhibit C**). JM's costs associated with these services total \$138,310. To determine the percentage of Site Preparation Construction Services – Campanella Base Bid that are attributable to IDOT, consistent with my attribution approach above, I applied the same percentage (74.2%) to these Campanella Base Bid Site Preparation Services for Site 3. This totals \$102,626.

Certain miscellaneous construction costs were incurred relating to Site 3 as shown on Table 5 of **Exhibit C** (i.e., installation of a fence and gate around Site 3). JM's costs associated with these activities total \$57,362²⁰. To determine the percentage of these costs attributable to IDOT, consistent with my attribution approach above, I applied the same percentage as above (74.2%) to JM's total costs for Site Preparation Construction Services - Miscellaneous on Site 3. This totals \$42,563.

Based upon the above, the portion of JM's Site 3 costs for Site Preparation Services attributable to IDOT totals \$710,118.

3.2.1.10.2 Site 6

JM incurred \$519,027 in costs for Site Preparation Professional Engineering Services rendered by LFR, Arcadis and AECOM for Site 6. To determine the percentage of Site Preparation Professional Engineering Services that are attributable to IDOT, I divided the portion of Site 6 costs for Construction Services that I determined were attributable to IDOT (\$466,915), by the Site 6 costs for Construction Services (\$1,232,059). I then applied this percentage (37.9%) to the costs for Site Preparation Professional Engineering Services on Site 6. The total costs I attributed to IDOT for Site Preparation Professional Engineering Services on Site 6 is \$196,711.

²⁰ The cost tabulation for installation of fence and gate for both Sites 3 and 6 reflect a credit amount (see Table 5 of **Exhibit C**). This credit amount was prorata applied to the costs for Site 3 and Site 6 which is why the amounts reflected in **Exhibit F** differ from those shown on Table 5 of **Exhibit C**.

Site Preparation Professional Engineering Services - Completion Costs for Site 6 generally include costs for services for Project Management, Regulatory Support, and AECOM Oversight (see Table 3 of **Exhibit B**). Services include, but are not limited to, DMP Resident Site Engineer support, performance of the final site survey, preparation of the USEPA-required Completion Report, finalization of the Completion Report based upon USEPA comments, AECOM support for finalization of utility agreements and covenants, support for regulatory site visits, and erosion repair services. Costs for these services are projected to total approximately \$53,250. To calculate the portion of these costs attributable to IDOT, I used the same rationale and applied the same percentage as above (37.9%) to JM's total Site Preparation Professional Engineering Services – Completion Costs for Site 6. This totals \$20,182.

Campanella Base Bid included Site Preparation work for Site 6. These services include surveying, construction of stormwater controls, installation of traffic controls, and clearing and grubbing (see Table 2 of **Exhibit C**). JM's costs associated with these services total \$95,560. To determine the percentage of Site Preparation Campanella's Base Bid Construction Services that are attributable to IDOT, I applied the same percentage as above (37.9%) to JM's total costs for Campanella's Base Bid Site Preparation Construction Services. This totals \$36,217.

Campanella T&M Construction Services also included Site Preparation work for Site 6. These services include relocation and subsequent removal of temporary fencing around Site 6 (see Table 3 of **Exhibit C**). JM's costs associated with these services total \$37,410. To determine the percentage of Site Preparation Campanella T&M Construction Services that are attributable to IDOT, I applied the same percentage as above (37.9%) to JM's total costs for Campanella T&M Site Preparation Construction Services. This totals \$14,178.

DMP allocated certain miscellaneous subcontractor costs to Site Preparation for Site 6. These services include installation of a fence and gate around Site 6 and clearing of Site 6 (see Table 5 of **Exhibit C**). JM's costs associated with these activities total \$102,082²¹. To determine the percentage of Site Preparation Miscellaneous subcontractor costs that are attributable to IDOT, I applied the same percentage as above (37.9%) to JM's total costs for Site Preparation Miscellaneous subcontractor costs for Site 6. This totals \$38,689.

Based upon the above, the portion of JM's Site 6 costs for Site Preparation activities attributable to IDOT totals \$305,978.

²¹ The cost tabulation for installation of fence and gate for both Sites 3 and 6 reflect a credit amount (see Table 5 of **Exhibit C**). This credit amount was prorata applied to the costs for Site 3 and Site 6 which is why the amounts reflected in **Exhibit F** differ from those shown on Table 5 of **Exhibit C**.

3.2.1.10.3 Site 3 and 6

DMP allocated certain of its management costs to Site Preparation for both Site 3 and Site 6. These were deemed to be services that related to Site 3 and Site 6 in general. These services include, but are not limited to, oversight of the construction entrance for the Sites, fence installation and relocation oversight, preparation of bid specifications, support of the bidding process, and participation in various utility meetings (see Table 4 of **Exhibit C**). JM's costs associated with these activities total \$74,300. To determine the percentage of costs for these DMP Site Preparation Construction Management Services costs to be allocated to IDOT, I divided the portion of Construction Services costs that I determined were attributable to IDOT for Combined Sites 3 and 6 (\$346,307), by the Sites 3 and 6 costs for Construction Services (\$548,602). I then applied this percentage (63.1%) to the DMP Site Preparation Construction Management Services on Combined Sites 3 and 6 (\$74,300). The total costs I attributed to IDOT for DMP Site Preparation Construction Management Services on Combined Site 3 and Site 6 are \$46,883.

3.2.1.11 Health and Safety

3.2.1.11.1 Site 3 and 6

Certain costs in Campanella's Base Bid related to Health and Safety Officer Daily Expenses (see Table 1 of **Exhibit C)**. These costs were allocated to the Health and Safety Bucket. Services included the full-time onsite presence of a Health and Safety officer for activities conducted on Site 3 and Site 6. JM's total costs for Health and Safety services totaled \$77,000.

To calculate the portion of these costs attributable to IDOT, consistent with my attribution approach for the Site Preparation, I divided the portion of Site 3 and Site 6 costs for Construction Services that I determined were attributable to IDOT (\$346,307), by the Site 3 and Site 6 costs for Construction Services (\$548,602). I then applied this percentage (63.1%) to the costs for Health & Safety. The total costs I attributed to IDOT for Health and Safety on Combined Site 3 and 6 are \$48,587.

3.2.1.12 EPA Oversight Costs

As part of the AOC, JM agreed to reimburse the USEPA for certain oversight costs. The USEPA issued invoices to JM for oversight work it performed from July of 2006 through June of 2016. JM paid these invoices in full. JM paid USEPA \$233,805 for Site 3 oversight and \$125,675 for Site 6 oversight. The amounts of USEPA's future invoices are unknown at this time. I reserve the right to amend this Report as USEPA issues additional invoices.

3.2.1.12.1 Site 3

To calculate the portion of JM's USEPA Oversight Costs attributable to IDOT for Site 3, I divided the portion of Site 3 costs for Construction Services that I determined were attributable to IDOT (\$1,094,891), by the Site 3 costs for Construction Services (\$1,476,454). I then applied this percentage (74.2%) to the USEPA Oversight Costs JM incurred on Site 3. The total costs I attributed to IDOT for USEPA Oversight on Site 3 is \$173,483.²²

3.2.1.12.2 Site 6

To calculate the portion of JM's USEPA Oversight Costs attributable to IDOT for Site 6, I divided the portion of Site 6 costs for Construction Services that I determined were attributable to IDOT (\$466,915), by the Site 6 costs for Construction Services (\$1,232,059). I then applied this percentage (37.9%) to the USEPA Oversight Costs JM incurred on Site 6. The total costs I attributed to IDOT for USEPA Oversight on Site 6 is \$47,631.

3.2.1.13 Costs for Legal/Legal Support Services (Manikas/Walker Wilcox Matousek)

Donald J. Manikas/Walker Wilcox Matousek provided non-litigation, Legal Support Services related to the negotiation of easements and other agreements, including cost reimbursement agreements, for Sites 3 and 6 to allow the utility work required by the RAWP. JM incurred costs of \$71,840 for services related to utility work on Sites 3 and 6. A detailed presentation of the costs for Legal Support Services has been included in **Exhibit D** (Manikas Invoice Table). I have applied these costs as related to Site 3 and Site 6.

To determine the percentage of Legal Support Services costs that are attributable to IDOT, I calculated the total costs for utility related work for Site 3, Site 6 and Site 3/6 (\$1,638,837). I then divided this by the costs for Site 3, Site 6 and Site 3/6 utility related work attributable to IDOT (\$778,660). I then applied this percentage (47.5%) to the Legal Support Services costs JM incurred. The total costs I attributed to IDOT for Legal Support Services for Site 3, 6, and 3/6 is \$34,124.

3.2.2 IDOT Attribution Summary

The following presents a table that summarizes the IDOT Cost Attribution amounts referenced in Section 3 above by Task Bucket:

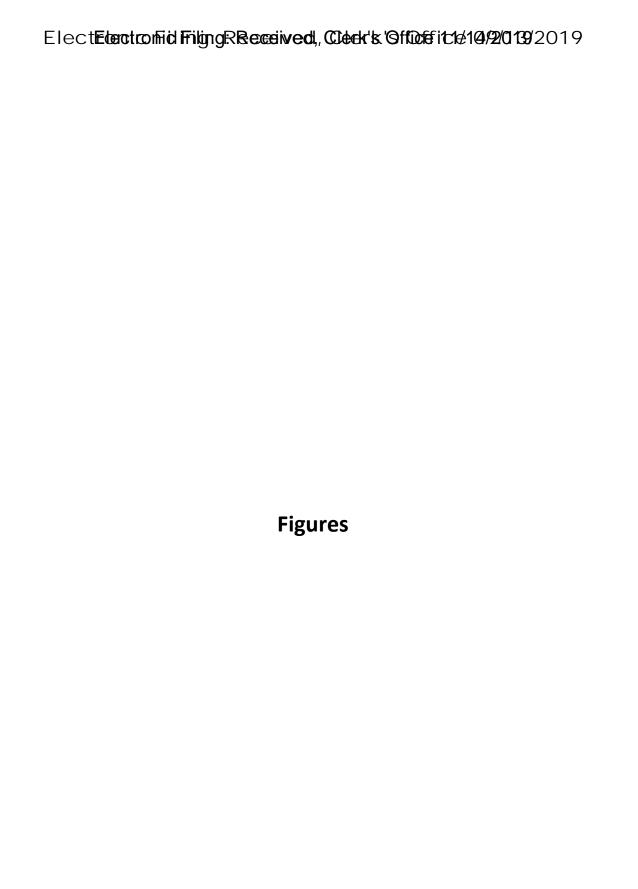
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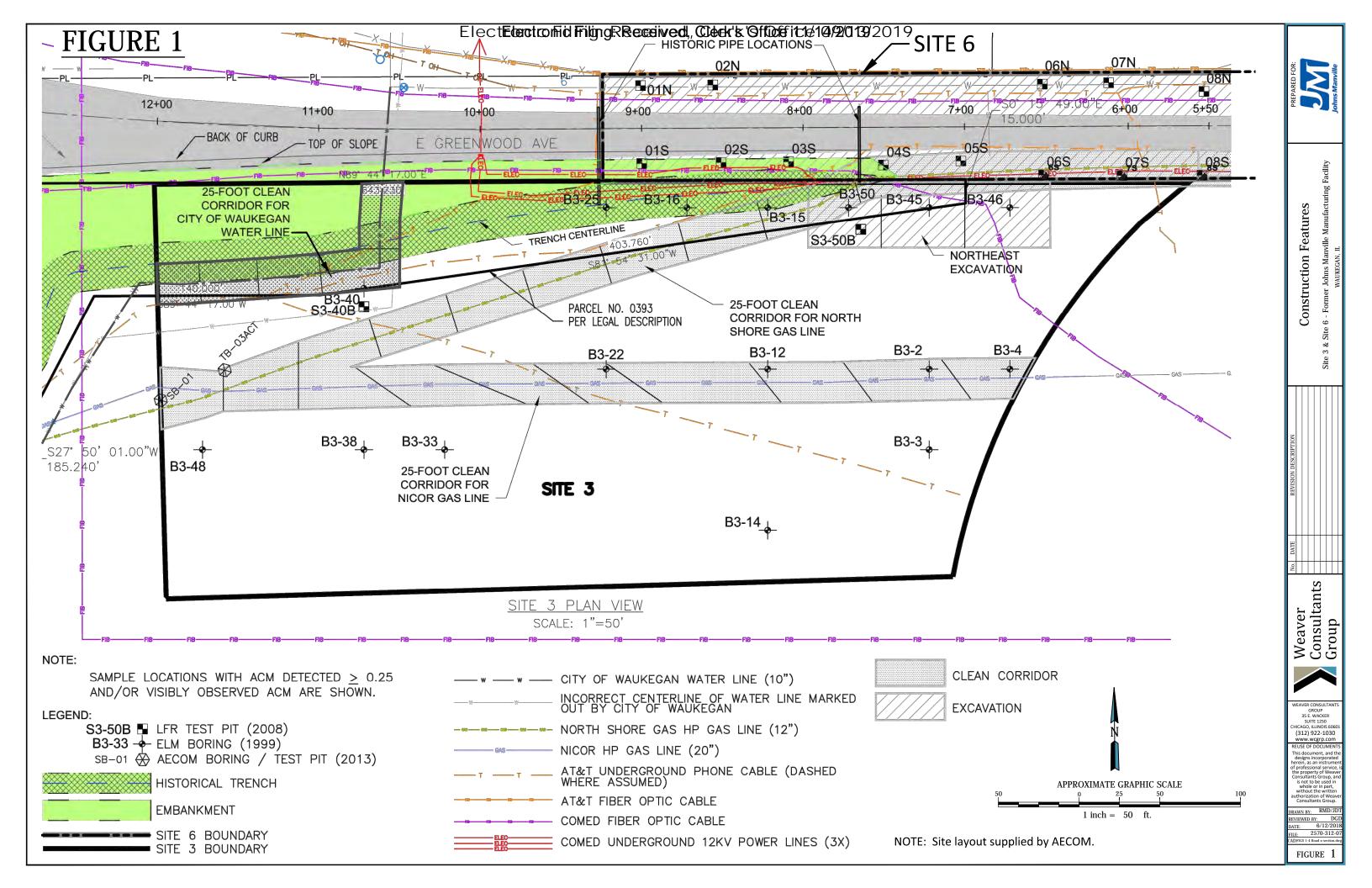
²² The calculations for total Construction Services costs are shown at the bottom of Exhibit F under the General Site/Site Preparation columns of the table.

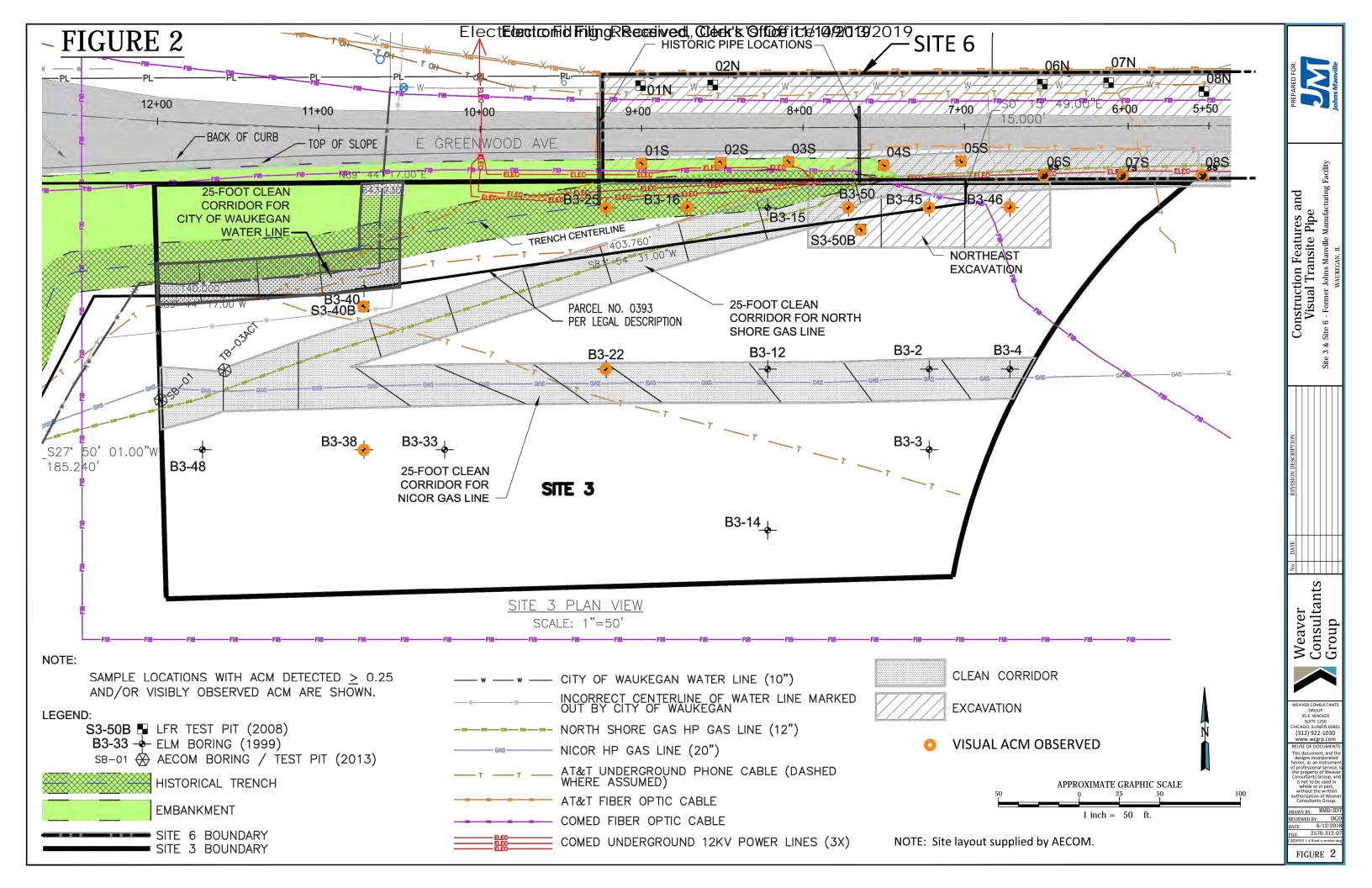
Task Bucket	Site 3	Site 6	Sites 3 and 6	Total
Nicor Gas	\$0	\$0	\$0	\$0
City of Waukegan Water Line	\$61,037	\$0	\$0	\$61,037
AT&T	\$71,710	\$88,858	\$40,449	\$201,017
Utility/ACM Excavation	\$0	\$77,659	\$0	\$77,659
North Shore Gas	\$332,524	\$65,597	\$40,826	\$438,947
Dewatering	\$217,803	\$79,625	\$27,775	\$325,203
Northeast Excavation	\$49,934	\$0	\$0	\$49,934
Filling/Capping	\$341,003	\$155,177	\$237,256	\$733,436
Ramp	\$20,880	\$0	\$0	\$20,880
General Site/Site Preparation	\$710,118	\$305,978	\$46,883	\$1,062,979
Health and Safety	\$0	\$0	\$48,587	\$48,587
USEPA Oversight Costs	\$173,483	\$47,631	\$0	\$221,114
Manikas/Walker Wilcox Matousek	\$0	\$0	\$34,124	\$34,124
Total	\$1,978,492	\$820,525	\$475,900	\$3,274,917

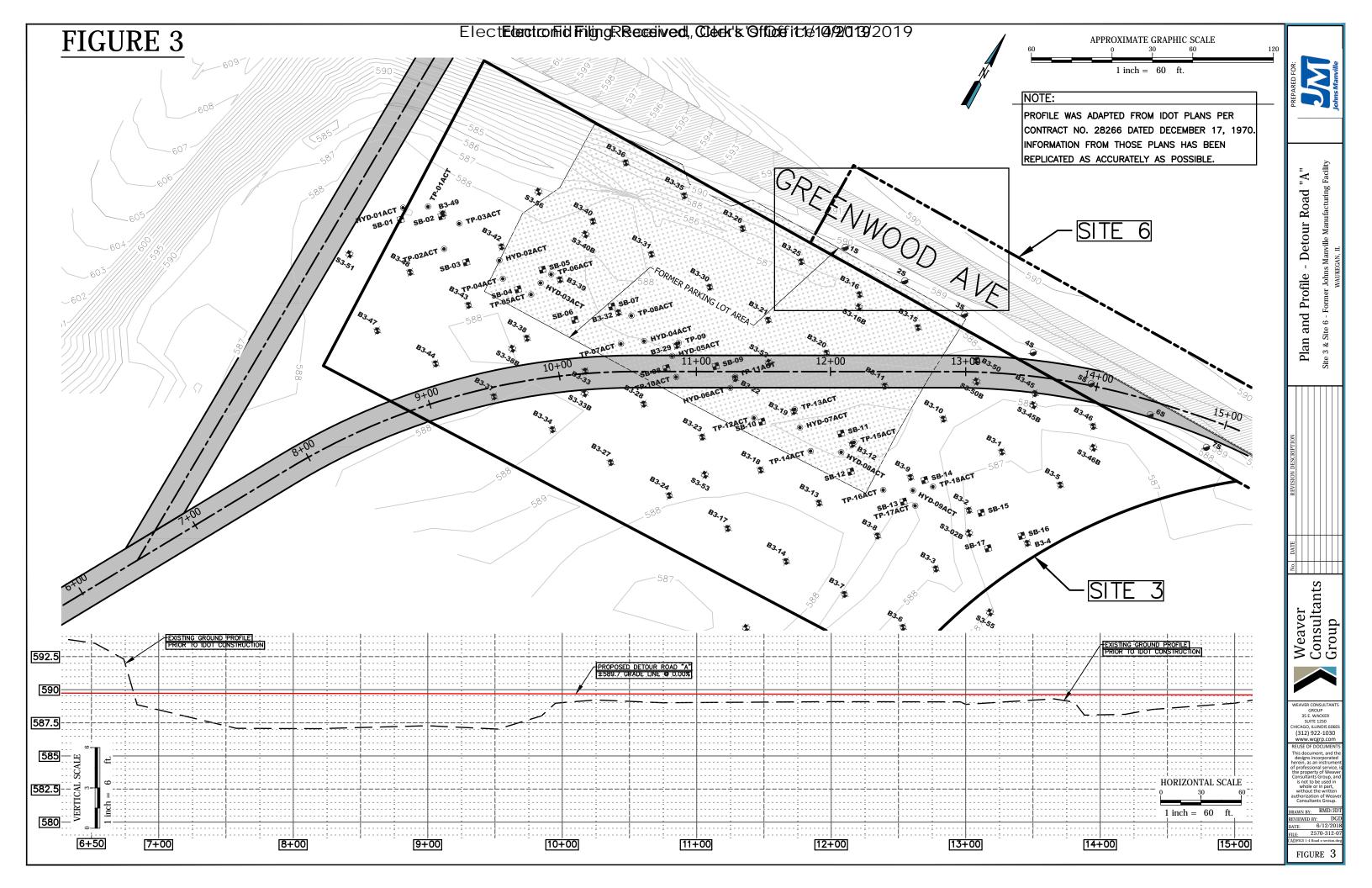
3.3 IDOT Attribution

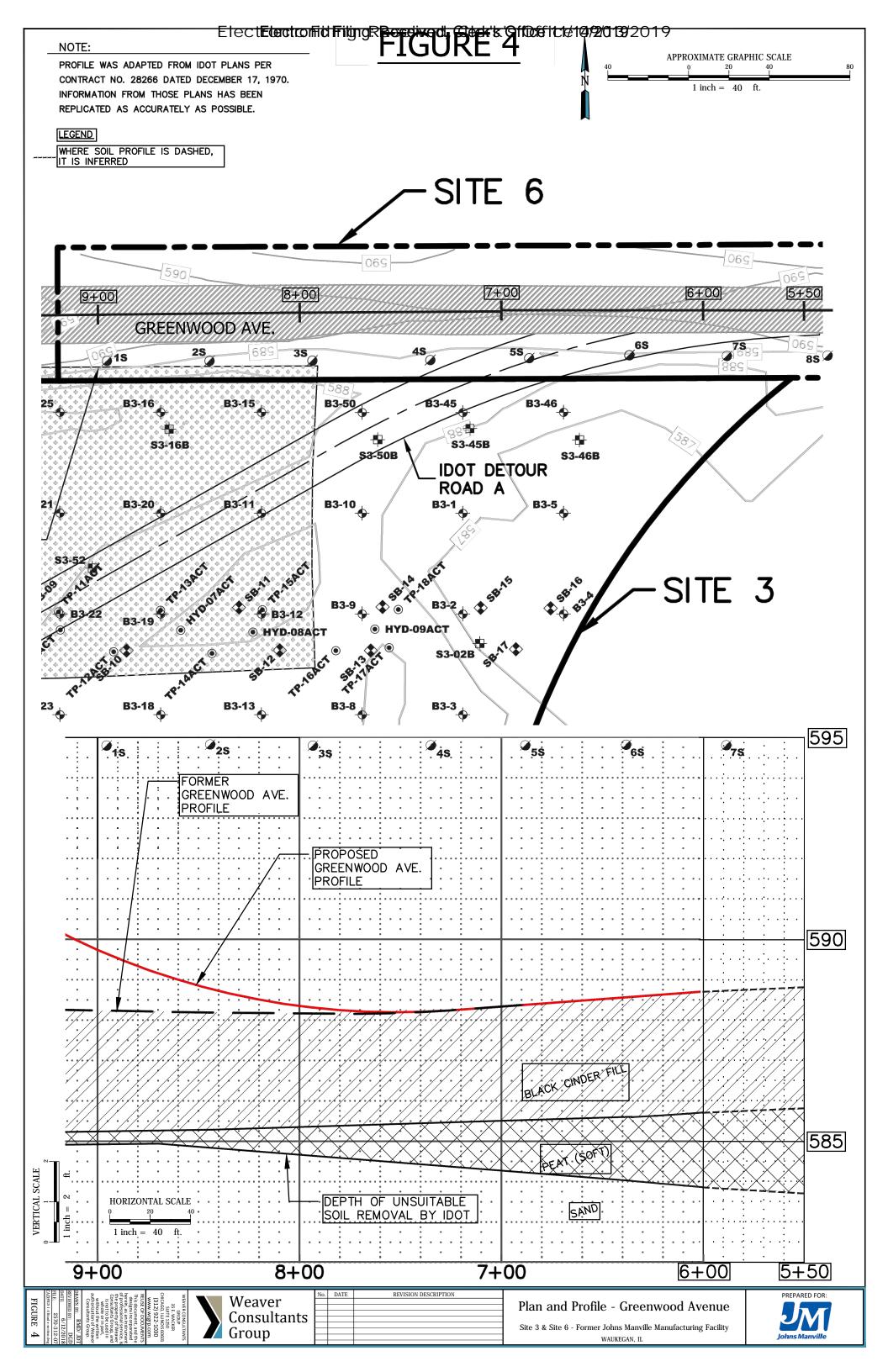
It is my opinion that \$3,274,917 of the costs JM incurred on Sites 3 and 6 are attributable to IDOT's violations of the Act as found by the Board in its IPCB Order.











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Exhibit A Dorgan Resume

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Principal

Fields of Expertise

Environmental Site Assessments, Environmental Permitting, Brownfield's Redevelopment, Groundwater Impact Assessments, Environmental Remedial Projects, Risk Based Corrective Action, Solid Waste Facility Design/Permitting/Construction Observation

Certification

Licensed Professional Geologist, State of Indiana Licensed Professional Geologist, State of Illinois OSHA Supervisor's Health & Safety Training Chemical-terrorism Vulnerability Information (CVI) Authorized User

Education

B.S. Earth Science, Eastern Illinois University, 1986 Graduate Course Work in Environmental Studies, Sangamon State University, 1986 M.S. Geography/Environmental Science, Northern Illinois University, 1993

Professional Summary

Mr. Dorgan serves as a Principal and Co-President for Weaver Consultants Group. He has previously lead the company's Environmental and Site, Building and Infrastructure (SBI) Practice Groups. He has over thirty years of environmental and solid waste control project experience. He has supervised completion of numerous projects including multi-phase environmental site assessments, risk based corrective action, Brownfield's redevelopment, hydrogeological investigations, groundwater impact assessments, remediation planning and implementation, multi media compliance audits, UST closures, and solid waste management facility design, permitting and environmental monitoring. He has been qualified as an Expert for various matters involving a range of topics including environmental response operations.

Prior to joining Weaver Consultants Group, Mr. Dorgan was an Office Director for a national environmental consulting firm.

Select Project Experience

He has been involved in over 100 state voluntary remediation program projects at sites located in states throughout the Midwest and Southwest. These projects have utilized a range of closure strategies involving site-specific fate and transport modeling, risk assessment, remediation, land use controls, and engineered barriers. Many of these projects were completed in support of property acquisition and consequently completed in accordance with aggressive schedule and risk mitigation requirements.

Mr. Dorgan has provided services to both private and public sector clients redeveloping Brownfield's. Plans have included residential, retail, commercial, industrial, and mixed use developments. Work has been performed pursuant to various state and federal grant and revolving loan programs. He also consults on the unique construction related aspects of developing distressed properties.

He has been the Principal in Charge for the Environmental Due Diligence associated with acquisition of the 3100 acre former Bethlehem/RG Steel facility in Sparrows Point, Maryland. Since completion of the property acquisition, Mr. Dorgan has been serving as the Project Coordinator on behalf of the owner, Tradepoint Atlantic, LLC. His responsibilities include coordination of environmental obligations being performed pursuant to regulatory agreements executed with both the Maryland Department of Environment and the United States Environmental Protection Agency.

Mr. Dorgan has been the Principal in Charge for environmental investigation and cleanup activities conducted by a Class I Railroad Operator at sites located in five states across the Midwest. Activities have included investigations and risk based cleanups conducted pursuant to various state voluntary cleanup programs.

He managed activities performed in compliance with a RCRA Hazardous Waste Management Permit for a major steel company located in Northwest Indiana.



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Responsibilities include supervision of preparation of permit renewal and amendment applications, permit negotiations with IDEM and USEPA, and ongoing groundwater sampling and reporting for a hazardous waste landfill network comprised of 64 monitoring points. Mr. Dorgan also managed RCRA Corrective Action activities for the site, including preparation of required plans and deliverables and investigation and corrective measures implementation pursuant to approved workplans.

Mr. Dorgan managed acquisition of a comprehensive "No Further Remediation" letter pursuant to the Illinois Site Remediation Program for a 14-acre parcel located in the northern suburbs of Chicago. A soil and groundwater investigation was performed to assess site impacts. Tier 2 modeling and development of site specific background following the Illinois Tiered Approach to Corrective Action Objectives (TACO) methods were used to support appropriate soil and groundwater remediation objectives. Remediation activities included removal of 45,000 tons of debris and fill material, and excavation and disposal of LUST contaminated soils.

As Principal in Charge, Mr. Dorgan was previously responsible for overseeing design, permitting and compliance activities for a Type II and III Solid Waste Disposal facility in Pines, Indiana. He was also responsible for oversight of ongoing RI/FS activities for the Town of Pines Superfund Site in Pines, Indiana. On behalf of a major PRP, Mr. Dorgan collaborated with other technical consultants on the implementation of the RI/FS and ongoing remedial measures development and construction.

He managed the site investigation and Indiana Voluntary Remediation Program activities for a large glass manufacturing facility in Central Indiana. Site investigation activities resulted in remediation of select facility areas to control for impacts attributable to semi-volatile organic compounds, polychlorinated biphenyl's (PCB's), and inorganic constituents. Additional site measures included removal of

contaminated creek sediments and implementation of a comprehensive groundwater investigation.

Mr. Dorgan managed an Illinois SRP application for a former die casting facility with PCB impacts to facility structures, soils, and shallow groundwater. Extensive site investigation was undertaken and TACO Tier 2 and 3 modeling performed. Certain remedial objectives for the project were approved through a Risk Based Disposal Approval Request submitted to USEPA Region 5..

He was Project Manager for a comprehensive Phase I Environmental Site Assessment of the General Motors Danville, IL gray iron foundry whose operations date to the early 1940s. Project required a detailed records review and site inspection to identify potential areas of concern. Subsequent responsibilities included developing a scope of work for site investigation.

Mr. Dorgan managed implementation of a facility-wide investigation for PCB-related impacts at a die casting facility in Chicago, Illinois. The investigation scope included sampling of soil, concrete, structural surfaces, and process equipment. Based on investigation results, alternative risk-based opinions were evaluated for site remediation. In support of on-going litigation, an engineering remediation cost estimate was generated.

Mr. Dorgan managed RCRA Corrective Action activities for a specialty steel manufacturing facility in Niles, Michigan. Activities included operation and monitoring of an Interim Measures groundwater remediation system, implementation of preliminary subsurface investigations, development of RCRA RFI Workplans, and negotiations with Michigan Department of Environmental Quality personnel.

He conducted comprehensive and media-specific environmental compliance audits of facilities located in four states for a major medical diagnostic imaging equipment manufacturer. Comprehensive audits were performed for select waste and scrap material management facilities. Audits included



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recommendations for corrective measures in addition to development of a division-wide program for management of recoverable waste streams.

Mr. Dorgan was the Project Manager for a Phase I and II Environmental Site Assessment of a 1.1 million square foot former can manufacturing facility in Chicago. Assessment activities were designed to evaluate long term liabilities and environmental considerations associated with facility reuse and/or demolition planning.

Mr. Dorgan was responsible for managing environmental compliance aspects of a comprehensive underground storage tank management program implemented by a major electric utility company in Northern Illinois. The project required UST removal oversight/closure certification, site investigation, regulatory reporting, corrective action design/supervision, and regulatory negotiation. Project activities were concurrently undertaken at over 30 sites.

Publications/Presentations

Contributing author "Municipal Solid Waste Landfills - Volume I General Issues," University of Illinois at Chicago, November, 1989

"Conducting Phase I Environmental Site Assessments," presented to the DeKalb County Economic Development Corporation, Industry Roundtable, DeKalb, IL, November, 1990

"Environmental Audits for Selection of Solid Waste Disposal Sites," presented at Waubonsee Community College, Sugar Grove, IL, November, 1992

"Distribution of Cadmium, Copper, Lead and Silver in Surface Soils of the Chicago Metropolitan Area," Northern Illinois University, August, 1993

"Conducting Effective Environmental Site Assessments," presented to the Institute of Business Law Conference 'Environmental Regulation in Illinois', September, 1993

"Minimizing Liability in Real Estate Transactions by Conducting Effective Environmental Site Assessments," New Mexico Conference on the Environment, Journal of Conference Proceedings, April, 1994

"General Geologic/Hydrogeologic and Contaminant Transport Principles," presented to ITT/Hartford Insurance Co., January, 1996

"Environmental Site Assessments and the Due Diligence Process," presented to the AIG Environmental seminar 'Legal Actions Against Facilities', March, 1998

"Brownfields Development, TACO and the SRP Process," presented to the Calumet Area Industrial Commission Executive Council, May, 1998

"Property Acquisition and the Due Diligence Process," presented to Cushman and Wakefield Corporate Services Department, August, 1998

"Brownfields Development, TACO and the SRP Process," presented to the Calumet Area Industrial Commission, March, 1999

"Risk Management Tools for Contaminated Site Development," presented to a construction industry seminar 'A View From the Top', February, 2000

"Voluntary Remediation of Brownfields/Risk Based Remediation" presented to Illinois Association of Realtors, October, 2002

"Blue Skies for Brownfields", Illinois Association of Realtors Magazine, May 2003

"Environmental Considerations Associated with Site Development", presented to Power Construction Operations Meeting, March 2006

"Weaver Consultants Group Environmental Manager AAI Roundtable", facilitator and presenter, June 2006

"Overview of AAI and ASTM E1527-05: The Changing Due Diligence Landscape", presented to Grand Rapids Chamber of Commerce Environmental Committee, January, 2007

"Weaver Consultants Group Environmental Manager Vapor Intrusion Roundtable", facilitator and presenter, July/November, 2007

"Brownfields Redevelopment: A Catalyst for Change", presented to Indiana University Northwest, July, 2011



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Exhibit B AECOM Cost Tabulation Correspondence

AECOM 4320 Winfield Road, Suite 300 Warrenville, IL 60555

312.829.3000 tel 312.829.9031 fax

February 15, 2018

Brent Tracy Johns Manville 717 17th Street Denver, CO 80202

Douglas G. Dorgan, Jr. Weaver Consultants Group Principal 35 E. Wacker Drive, Suite 1250 Chicago, IL 60601

Subject: Updated Summary of Site 3 and Site 6 Costs, Southwestern Sites Area of Concern, Waukegan, IL

Dear Mr. Tracy and Mr. Dorgan,

Please find the AECOM Technical Services, Inc. (AECOM) updated cost summary for Site 3 and Site 6 of the Southwestern Sites Area of Concern in Waukegan, Illinois. Costs invoiced to Johns Manville from April 28, 2007 to September 8, 2017 by LFR Inc., ARCADIS U.S. Inc., and AECOM are summarized in Table 1. Narrative descriptions of costs summarized in Table 1 are provided in Attachment A.

A summary of estimated completion costs from September 9, 2017 to the anticipated final approval of the completion of work by the U.S. Environmental Protection Agency is included in Table 2 (Site 3) and Table 3 (Site 6). Estimated operation and maintenance (O&M) cost during a 30-year period for the Southwestern Sites Area of Concern following the completion of work is provided in Table 4 and Table 5.

Please contact me with any questions at 312.577.7429.

Yours sincerely,

Tat Ebihara, PE, PhD Senior Project Manager

Jat Elihana

Attachments:

Table 1 - Site 3 and Site 6 Invoiced Costs to JM (April 28, 2007 to September 8, 2017)

Table 2 - Site 3 Completion Costs

Table 3 - Site 6 Completion Costs

Table 4 - 30-Year O&M Costs

Table 5 - Annual O&M Cost Basis

Attachment A – Narrative Descriptions of Invoiced Costs to JM from April 28, 2007 to September 8, 2017

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Table 1. Site 3 and Site 6 Costs Invoiced to JM, April 28, 2007 to Sept 8, 2017 Southwstern Sites Area of Concern, Waukegan, Illinois

Invoice Date	Timeframe	Site	Invoice Total	Combined Site 4/5 & Site 6 costs* Primary Work Activity	Cost Catego	ory		Cost Breakdo	own		Cost Basis (% of Site 3&6 for each bucket)	Nicor	Gas	Waukegan	Water (CWW)	А	т&т	ComEd	I	North S	hore Gas	Northeaster	n Excavation	Rar	mp	Gen Sit	ieral ite
IED Invoices			Site 3 Site 6		EE/CA Investigation and Alternatives Removal Action Work Plan (Soils) Removal Action Work	Plan (Utilities) Construction Support	Nicor Gas City of Waukegan - Water	AT&T ComED North Shore Gas	NE Excavation Ramp	General Site		Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6
20-Jun-2007	4/28/07 - 6/01/07	Site 3 Site 6	\$ 1,320 \$ 664	Site4/5 & Site 6= \$ 1,327 EE/CA Investigation Planning, Site 4/5 costs (50%) removed*	x x					100%	No utilities.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ 1,320	\$ 66
-	6/01/07 - 6/29/07	Site 3 Site 6	\$ - \$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
-	6/30/07 - 7/27/07	Site 3 Site 6	\$ 3,810 \$ 4,665	Site4/5 & Site 6= \$ 9,331 EE/CA Investigation Planning, Site 4/5 costs (50%) removed*	x x					100% 100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ 3,810	\$ 4,66
-	7/28/07 - 8/31/07	Site 3 Site 6	\$ 3,936 \$ 3,685	Site4/5 & Site 6= EE/CA Investigation Planning Site 4/E costs (E0%) removed*	x x					100% 100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ 3,936	\$ 3,68
-	9/1/07 - 9/28/07	Site 3 Site 6		Site4/5 & Site 6= \$ 33 EE/CA Investigation Planning, Site 4/5 costs (50%) removed*	x x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	š -	\$ - \$	-	\$ -	š -	\$ -	s -			\$ 33	
-	10/1/07 - 11/2/07	Site 3 Site 6	\$ 3,930 \$ 16	Site4/5 & Site 6= \$ 33 EE/CA Investigation Planning, Site 4/5 costs (50%) removed*	x x					100% 100%	No utilities	\$ -	š -	\$ -	\$ -	\$ -	s -	\$ -		\$ -	ś -	\$ -	\$ -			\$ 3,930	Ś
-	11/3/07 - 11/30/07	Site 3 Site 6	\$ 601	Site4/5 & Site 6= \$ 601 EE/CA Investigation Planning, Site 4/5 costs (50%) removed*	x x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ 601	\$ 30
-	12/1/07 - 12/28/07	Site 3 Site 6	\$ 768 \$ 384	Site4/5 & Site 6= FF/CA Investigation Planning Site 4/5 costs (50%) removed*	x x					100% 100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	ś -	\$ -	-	\$ -	ś -	\$ -	\$ -			\$ 768	Ś 3
-	12/29/07 - 1/25/08	Site 3 Site 6	\$ 7,512 \$ 3,011	Site4/5 & Site 6= Field Investigation and EE/CA, Site 4/5 costs (grid based %) \$ 8,520 removed*	x x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	š -	\$ -	-	\$ -	Ś -	\$ -	\$ -			\$ 7,512	\$ 3,01
11-Mar-2008	1/26/08 - 2/22/08	Site 3 Site 6	\$ 10,933	Site4/5 & Site 6= Field Investigation and EE/CA, Site 4/5 costs (grid based %) 51,681 removed*	x x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	š -	\$ - \$	-	\$ -	s -	\$ -	s -		-	\$ 10,933	
15-Apr-2008	2/23/08 - 3/28/08	Site 3 Site 6	\$ 2,105 \$ 18,152	Site4/5 & Site 6= Field Investigation and EE/CA, Site 4/5 costs (grid based %)	x x					100% 100%	No utilities	\$ -	\$ -	\$ -	S -	\$ -	s -	\$ -		\$ -	s -	\$ -	s -			\$ 2,105	\$ 18,15
8-May-2008	3/29/08 - 4/25/08	Site 3	\$ 19,286	Site4/5 & Site 6= Field Investigation and EE/CA, Site 4/5 costs (grid based %)	x					100%	No utilities	\$ -	¢ .	\$ -	\$ -	\$ -	ς .	\$ -		\$ -	\$ -	\$ -	\$ -			\$ 19,286	
17-Jun-2008	4/26/08 - 5/23/08	Site 3 Site 6	\$ 10,768 \$ 3,991.88	Site4/5 & Site 6= Field Investigation and EE/CA, Site 4/5 costs (grid based %) \$ 11,295 removed*	x					100% 100%	No utilities	\$ -	¢ .	\$ -	9	\$ -		\$ -		\$ -	¢ .	\$ -	\$.			\$ 10,768	
18-Jul-2008	5/29/08 - 6/27/08	Site 3	\$ 12,996 \$ 8,153	Site4/5 & Site 6= Field Investigation and EE/CA, Site 4/5 costs (grid based %)	x					100%	No utilities	\$ -	¢ .	\$ -	9	\$ -		\$ -		\$ -	¢ .	\$ -	\$.			\$ 12,996	
12-Aug-2008	6/28/08 - 7/25/08	Site 3 Site 6	\$ -	No Site 3 or Site 6 work						100%	No Site 3 or Site 6 work	\$ -	¢ .	\$ -	9	\$ -		\$ -		\$ -	4	\$ -	\$			\$ -	9 0,1
29-Aug-2008	7/26/08 - 8/22/16	Site 3	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%) S 8.415 removed*	x					100%	No utilities	\$ -	¢ .	\$ -	Š -	\$ -		\$ -		\$ -	٠ -	\$ -	\$.			\$ -	\$ 4.20
23-Oct-2008	8/23/08 - 9/26/08	Site 3 Site 6	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No utilities	\$ -	¢ .	\$ -	9	\$ -		\$ -		\$ -	4	\$ -	\$			\$ -	\$ 2,01
24-Nov-2008	9/27/08 - 10/24/08	Site 3	\$ 2,358	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No utilities	\$ -	c	\$ -	\$ -	\$ -		\$ -		\$ -	۹ .	\$ -	ć			\$ 2,358	
-	10/25/08 - 11/21/08	Site 3 Site 6	\$ 3,411 \$ 1,267	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	X					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ 3,411	
22-Jan-2009	11/21/08 - 12/28/08	Site 3 Site 6	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No utilities	\$ -	, ·	\$ -	3 -	\$ -	,	\$ -	-	\$ -	\$.	\$ -	, .			\$ -	\$ 67
17-Feb-2009	12/29/08 - 1/25/09	Site 3 Site 6	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No utilities	\$ -	, ·	\$ -	3 -	\$ -	,	\$ -	-	\$ -	, .	\$ -	, .			\$ -	\$ 5,57
16-Mar-2009	1/25/09 - 2/22/09	Site 3 Site 6	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No utilities	\$ -	, -	\$ -	7	\$ -	,	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$ 5,80
21-Apr-2009	2/22/09 - 3/29/09	Site 6	\$ 5,807	No Site 3 or Site 6 work	×					100%		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$ 5,80
21-May-2009	3/29/09 - 5/3/09	Site 3	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
-	5/3/09 - 5/31/09	Site 6 Site 3	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
13-Jul-2009	6/1/09 - 7/5/09	Site 6 Site 3	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
24-Aug-2009	7/6/09 - 8/2/09	Site 6 Site 3	\$ 55	\$ 110 removed* No Site 3 or Site 6 work	X	+				100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
23-Sep-2009	8/2/09 - 8/30/09	Site 6 Site 3	\$ -	No Site 3 or Site 6 work		+					No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
22-Oct-2009	8/31/09 - 10/4/09	Site 6 Site 3	\$ -	Site4/5 & Site 6= EE/CA Response to Regulatory Comments, Site 4/5 costs (50%)	x	+				100%	No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
23-Nov-2009	10/5/09 - 11/1/09	Site 6 Site 3	\$ (55)) \$ (110) removed* No Site 3 or Site 6 work	x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$ (5
23-1904-2009		Site 6 Site 3	\$ -			+					No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -		7	\$ -	\$
-	11/2/09 - 11/29/09	Site 6 Site 3	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$
-	11/30/09 - 12/20/09	Site 6	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work		\$ -		\$ -		\$ -	\$	-		\$ -		\$ -				\$

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Table 1. Site 3 and Site 6 Costs Invoiced to JM, April 28, 2007 to Sept 8, 2017 Southwstern Sites Area of Concern, Waukegan, Illinois

Invoice Date	Timeframe	Site	Invoice Total	Combined Site 4/5 & Site 6 costs*	Primary Work Activity	(Cost Category		Cost Bre	akdown		Cost Basis (% of Site 3&6 for each bucket)	Nicor	Gas	Waukegan \	Vater (CWW)	A	'&Т	Co	mEd	North Sh	ore Gas	Northeaster	n Excavation	Rai	np	General Site
			Site 3 Site 6				Removal Action Work Plan (Soils) Removal Action Work Plan (Utilities) Construction Support	Nicor Gas City of Waukegan - Water	AT&T ComED	North Shore Gas	Ramp General Site		Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3 Site 6
rcadis (formerly		Site 3				1							¢ -		Ś -		Ġ -		\$ -		¢ .		\$ -				· -
10-Feb-2010	12/21/09 - 1/24/10	Site 6	\$ -	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	,	\$ -	,	\$ -	,	\$ -	,	\$ -	,	\$ -	,	\$ -			\$
10-Mar-2010	1/24/10 - 2/21/10	Site 3	\$ 4,327	EE/CA	Response to Regulatory Comments	x x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 4,327
7-Apr-2010	2/22/10 - 3/28/10	Site 3 Site 6	\$ 7,350 \$ 3,675		Response to Regulatory Comments, Site 4/5 costs (50%) x					100% 100%		\$ -		\$ -		\$ -		\$ -	ć	\$ -		\$ -	ć			\$ 7,350
19-May-2010	3/29/10 - 4/25/10	Site 3	4,276	Site4/5 & Site 6= EE/CA	Response to Regulatory Comments, Site 4/5 costs (50%)) x					100%	5	\$ -	, -	\$ -	\$ -	\$ -	3 -	\$ -	\$ -	\$ -	, -	\$ -	Ş -			\$ 4,276
1-Jun-2010	4/26/10 - 5/23/10	Site 6 Site 3	\$ 2,138	7 .,	ed* Response to Regulatory Comments, Site 4/5 costs (50%) x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 2,:
		Site 6 Site 3	\$ 405	\$ 810 remove	ed* Response to Regulatory Comments, Site 4/5 costs (50%)	x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 4
13-Jul-2010	5/24/10 - 6/27/10	Site 6	\$ 439	\$ 878 remove	ed*	x						No utilities		\$ -		\$ -	,	\$ -	\$ -	\$ -	ć	\$ -		\$ -			\$ 4
2-Aug-2010	6/28/10 - 7/25/10	Site 3	\$ 3,176 \$ 1,588	\$ 3,176 remove		x					100%	No utilities	> -	\$ -	\$ -	\$ -	\$ -	\$ -	3 -	\$ -	· ·	\$ -		\$ -			\$ 3,176
31-Aug-2010	7/26/10 - 8/22/10	Site 3	\$ 44 \$ 22	Site4/5 & Site 6= EE/CA \$ 44 remove	Response to Regulatory Comments, Site 4/5 costs (50% ed*) x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 44
8-Oct-2010	8/23/10 - 9/26/10	Site 3	5 -	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	¢ .	\$ -	¢ .	\$ -	٠ .	\$ -	¢ .	\$ -	٠ .	\$ -	¢ .			\$ -
2-Nov-2010	9/27/10 - 10/24/10	Site 3			Response to Regulatory Comments, Site 4/5 costs (50%) x					100%	,	\$ -		\$ -	,	\$ -		\$ -		\$ -		\$ -	,			\$ 338
	10/25/10 - 11/21/10	Site 6 Site 3	\$ 169	Site4/5 & Site 6= EE/CA	Response to Regulatory Comments, Site 4/5 costs (50%)) x					100%		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 733
		Site 6	\$ 366	\$ 733 remove	ed* Response to Regulatory Comments, Site 4/5 costs (50%) x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	s -	\$ -	s -	\$ -			\$ 135
12-Jan-2011	11/22/10 - 12/26/10	Site 6	\$ 68	\$ 135 remove	ed*	х						No utilities	^	\$ -	,	\$ -		\$ -		\$ -		\$ -		\$ -			\$
7-Feb-2011	12/28/10 - 1/23/11	Site 3	\$ 2,250 \$ 1,125	\$ 2,250 remove		х						No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 2,250 \$ 1,
7-Mar-2011	1/24/11 - 2/20/11	Site 3 5	\$ 1,961 \$ 609		Response to Regulatory Comments, Site 4/5 costs (50% ed*) x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 1,961
5-Apr-2011	2/21/11 - 3/27/11	Site 3 5	\$ 4,186		Response to Regulatory Comments, Site 4/5 costs (50% ed*) x					100%	No utilities	\$ -	¢ .	\$ -	ė .	\$ -	¢ .	\$ -	ė .	\$ -	٠ .	\$ -	¢ .			\$ 4,186 \$ 2,
28-Apr-2011	3/28/11 - 4/24/11	Site 3		Site4/5 & Site 6= EE/CA	Response to Regulatory Comments, Site 4/5 costs (50%) x					100%		\$ -	ς .	\$ -	1	\$ -		\$ -		\$ -	ς .	\$ -	\$ -			\$ 6,724
1-Jun-2011	4/25/11 - 5/22/11	Site 3	\$ 3,302		e 3 or Site 6 work						100%		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 3,
		Site 6	\$ -			+ +						No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ -
11-Jul-2011	5/23/11 - 6/26/11	Site 6 Site 3	\$ -		e 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$
3-Aug-2011	6/27/11 - 7/24/11	Site 6	\$ -	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	Ť	\$ -	,	\$ -	,	\$ -	· ·	\$ -	,	\$ -		\$ -			\$
29-Aug-2011	7/25/11 - 8/21/11	Site 3	\$ -		e 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ -
3-Oct-2011	8/22/11 - 9/25/11	Site 3 5	\$ 135	Site4/5 & Site 6= Post-El	E/CA Regulatory Support, Site 4/5 costs (50%) removed	* x					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 135
3-Nov-2011	9/26/11 - 10/23/11	Site 3	-	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	۲	\$ -	4	\$ -	۲	\$ -	4	\$ -	\$	\$ -	4			\$ -
1-Dec-2011	10/24/11 - 11/20/11	Site 3	68	Site4/5 & Site 6= Post-E	EE/CA Regulatory Support, Site 4/5 costs (50%) removed	* x					100%	5	\$ -	, .	\$ -	· ·	\$ -	, .	\$ -	, .	\$ -	· -	\$ -	, -			\$ 68
6-Jan-2012	11/21/11 - 12/25/11	Site 6 Site 3	\$ 34	\$ 68	e 3 or Site 6 work	X					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ -
		Site 6 Site 3	\$ -	 		+						No utilities	\$ -	\$ -	\$ -	\$ -	s -	\$ -	s -	\$ -	s -	\$ -	\$ -	\$ -			\$
8-Feb-2012	12/26/11 - 1/22/12	Site 6	\$ -		e 3 or Site 6 work							No utilities	,	\$ -		\$ -	,	\$ -	,	\$ -		\$ -	,	\$ -			\$
24-Feb-2012	1/23/12 - 2/19/12	Site 3	\$ 135	Site4/5 & Site 6= \$ 135	E/CA Regulatory Support, Site 4/5 costs (50%) removed	* X					100% 100%		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ 135 \$
3-Apr-2012	2/20/12 - 3/25/12	Site 3 5	\$ -	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ -
29-May-2012	4/23/12 - 5/20/12	Site 3	-	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	¢	\$ -	¢	\$ -	¢	\$ -	ė	\$ -	¢	\$ -	ς .			\$ -
5-Jul-2012	5/21/12 - 6/24/12	Site 3	5 68	Site4/5 & Site 6=	E/CA Regulatory Support, Site 4/5 costs (50%) removed	* x					100%	5	\$ -		\$ -	- پ	\$ -		\$ -	,	\$ -		\$ -	Ť			\$ 68
30-Jul-2012		Site 6 Site 3	\$ 34	\$ 68	e 3 or Site 6 work	х					100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			\$ -
	6/25/12 - 7/22/12	Site 6 Site 3	\$ -			+						No Site 3 or Site 6 work	\$ -	\$ -	s -	\$ -	s -	\$ -	S -	\$ -	s -	\$ -	Š -	\$ -			\$
22-Aug-2012	7/23/12 - 8/19/12	Site 6	\$ -	No Site	e 3 or Site 6 work							No Site 3 or Site 6 work	, -	\$ -	, .	\$ -	, .	\$ -	, .	\$ -	, .	\$ -	, .	\$ -			\$

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Table 1. Site 3 and Site 6 Costs Invoiced to JM, April 28, 2007 to Sept 8, 2017 Southwstern Sites Area of Concern, Waukegan, Illinois

Invoice Date	Timeframe	Site	Invoice Total	Combined Site 4/5 & Site 6 costs* Primary Work Activity		Cost Category		Cost Bro	eakdown		Cost Basis (% of Site 3&6 for each bucket)	Nicor	r Gas	Waukegan \	Water (CWW)	А	т&т	(ComEd	North S	hore Gas	Northeaste	ern Excavation	Ra	атр	General Site
			Site 3 Site 6		EE/CA Investigation and Alternatives	Removal Action Work Plan (Soils) Removal Action Work Plan (Utilities) Construction Support	Nicor Gas Lity of Waukegan - Water	AT&T ComED	North Shore Gas NE Excavation	Ramp General Site		Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3 Site 6
AECOM Invoices																										
2-Mar-2012	Feb 6, 2012-Mar 2, 2012	Site 3 Site 6	\$ 5,191 \$ 5.19	Site4/5 & Site 6= 1 S 10.383 Post-EE/CA Regulatory Support, Site 4/5 costs (50%) removed	* X					100%	o No utilities	\$ -	\$ -	\$ -	s -	\$ -	· .	\$	- s -	\$ -	s -	\$ -	· .			\$ 5,191
10-Apr-2012	Mar 3, 2012 - Mar 30, 2012	Site 3 Site 6	\$ 3,825	Site4/5 & Site 6= 1 \$ 7,663 Post-EE/CA Regulatory Support, Site 4/5 costs (50%) removed	* X					100%		\$ -	ć	\$ -	ć	\$ -		\$	- 6	\$ -	ć	\$ -				\$ 3,825
7-Jun-2012	Mar 31, 2012-June 6,	Site 3	\$ 642	Site4/5 & Site 6= Post FE/CA Pagulaton/Support Site 4/E sorts (F0%) removed	* X					100%	5	\$ -		\$ -	,	\$ -	,	\$	-	\$ -	,	\$ -				\$ 642
	2012 Jun 8, 2012-Jun 29, 2012	Site 6 Site 3	\$ 216	Site4/5 & Site 6= Post-FF/CA Regulatory Support Site 4/5 costs (50%) removed	×		++-			100%		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$	- \$	\$ -	\$ -	\$ -	\$ -			\$ 64
13-Aug-2012	Jun 30, 2012 - Aug 3,	Site 6 Site 3	\$ 210	No Site 3 or Site 6 work	х		+ + -			100%	No utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$	\$.	\$ -	\$ -	\$ -	\$ -			\$ 2
	2012 Aug 4, 2012- Aug 31,	Site 6 Site 3	\$ -								No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	Ś -	\$ -	- S	\$.	\$ -	\$ -	\$ -	\$ -			\$
31-Aug-2012	2012 Sept 1, 2012 - Oct 12,	Site 6 Site 3	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	ė .	\$ -		\$ -	ė .	\$ -	- 4	\$.		\$ -		\$ -			\$
25-Oct-2012	2012	Site 6	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	, .	\$ -		\$ -	, .	\$ -	-	\$.		\$ -	,	\$ -			\$
13-Jul-2012	6/1/12 - 6/29/12	Site 3 Site 6	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$.		\$ -	\$ -	\$ -			\$ -
13-Jul-2012	6/30/12 - 10/12/12	Site 3 Site 6	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work	\$ -		\$ -		\$ -		\$	-	\$ -		\$ -				\$ -
14-Nov-2012	Oct 13, 2012-Nov 9, 2012	Site 3 Site 6	\$ 11 \$ 1	Site4/5 & Site 6= 1 \$ 23 Post-EE/CA Regulatory Support, Site 4/5 costs (50%) removed	* X					100% 100%	Assume no significant utility work															\$ 11 \$
20-Dec-2012	Nov 10 2012-Dec 7, 2012	Site 3 Site 6	\$ -	No Site 3 or Site 6 work							No Site 3 or Site 6 work															\$ -
18-Jan-2013	Dec 8 2012-Jan 11, 2013	Site 3 Site 6	\$ 7,064	Site4/5 & Site 6= 4 \$ 14,128 Removal Action Work Plan, Site 4/5 costs (50%) removed*		x x				100%	Assume no significant utility work															\$ 7,064
14-Feb-2013	Jan 12, 2013-Feb 8, 2013	Site 3 Site 6	\$ 8,224	Site4/5 & Site 6= Removal Action Work Plan Site 4/5 costs (50%) removed*		x x				100%																\$ 8,224
25-Mar-2013	Feb 9, 2013 - Mar 11, 2013	Site 3 Site 6	\$ 9,606	Site4/5 & Site 6= 5 \$ 19,212 Removal Action Work Plan, Site 4/5 costs (50%) removed*		х				100%																\$ 9,606
29-Apr-2013	Mar 12, 2013- Apr 19,	Site 3	\$ 9,159	Site4/5 & Site 6= Utility Agreements & Work Plans, Site 4/5 costs (50%)		×				100%	See invoice back-up									\$ 735	\$ 1.365					\$ 8,424
22-May-2013	2013 Apr 20, 2013 - May 17, 2013	Site 6 Site 3	\$ 9,15	Site4/5 & Site 6= Utility Agreements & Work Plans, Site 4/5 costs (50%)		x x					See invoice back-up	\$ 12,523		\$ 214							\$ 1,50:					\$ 4,770
14-Jun-2013	May 18, 2013- Jun 7,	Site 6 Site 3	\$ 31,366	Site4/5 & Site 6= Utility Agreements & Work Plans, Site 4/5 costs (50%)		x					See invoice back-up	\$ 14,058		\$ 321						\$ 1,180						\$ 15,807
	2013	Site 6 Site 3	\$ 4,28	4 \$ 8,568 removed* Site4/5 & Site 6= Utility Agreements & Work Plans, Site 4/5 costs (50%)		x x					· · · · · · · · · · · · · · · · · · ·	\$ 51,339		\$ 988	\$ 3,206						\$ 2,400	0				\$ 44,687
	Jun 8, 2013 - Aug 9, 2013- August 10, 2013-	Site 6 Site 3	\$ 12,27 \$ 43,735	2 \$ 24,545 removed* split site 4/5 and Utility Agreements and Work Plans-Invoices separate Site 4/5	1	x x			\vdash		See invoice back-up	\$ 10,688			\$ 7,904	\$ 5,700				\$ 5,700						\$ 4,3
27-Sep-2013	September 20, 2013 September 21, 2013 -	Site 6		B site 6 into separate and Site 6 costs for dates after August 10, 2013		x x					See invoice back-up	\$ 2,565		\$ 1,323	\$ 7,763					\$ 3,750						\$ 4,7
17-Oct-2013	October 11, 2013	Site 6	\$ 8,02	B Utility Agreements and Work Plans		×					See invoice back-up	y 2,305			\$ 1,337		\$ 1,27	5			\$ 1,275	5				\$ 4,1
18-Dec-2013	October 12, 2013- November 8, 2013	Site 3 Site 6	\$ 70,826	Utility Agreements and Work Plans		x x					See invoice back-up			\$ 2,013	\$ 3,463	\$ 7,570	\$ 6,75	3		\$ 6,525	\$ 4,425	5				\$ 54,719
23-Dec-2013	November 9, 2013 - December 6, 2013	Site 3 Site 6	\$ 21 \$ 1,35	Utility Agreements and Work Plans		x x					See invoice back-up				\$ 1,155						\$ 150)				\$ 21
3-Feb-2014	December 7, 2013 - January 10, 2014	Site 3	\$ 8,464	Utility Agreements and Work Plans		x					See invoice back-up			\$ 3,590	\$ 5,785						\$ 1,050					\$ 4,874
14-Mar-2014	January 11, 2014 - March 7, 2014	Site 6 Site 3 Site 6	\$ 13,79	7 Utility Agreements and Work Plans		x					See invoice back-up				y 3,783						, 1,050	1				\$ 153
29-Apr-2014	March 8, 2014 - April 11,	Site 3	\$ 3	Litility Agreements and Work Plans		x					See invoice back-up															\$ 3
10-Jun-2014	2014 April 12, 2014 - May 23,	Site 6 Site 3	-\$9	No Site 3 or Site 6 work		x																				\$ (
	2014 May 24, 2014 - July 4,	Site 6 Site 3	\$ -			x					No Site 3 or Site 6 work															\$ 403
11-Jul-2014	2014	Site 6	\$ -	Utility Agreements and Work Plans		x					See invoice back-up															\$

Table 1. Site 3 and Site 6 Costs Invoiced to JM, April 28, 2007 to Sept 8, 2017 Southwstern Sites Area of Concern, Waukegan, Illinois

Invoice Date	Timeframe	Site	Invoice Tota	Combined Site 4/5 & Site 6 costs*	Primary Work Activity	Cost Category	,		Cost Bre	akdown		Cost Basis (% of Site 3&6 for each bucket)	Nicor Ga	is	Waukegan	Water (CWW)	A	г&т	Co	mEd	North Sh	ore Gas	Northeaste	rn Excavation	Rai	mp	Gen Sit	
				iite 6		EE/CA Investigation and Alternatives Removal Action Work Plan (Soils) Removal Action Work Plan (Ivilities)	Construction Support Nicor Gas	City of Waukegan - Water	AT&T	North Shore Gas NE Excavation	Ramp General Site		Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6	Site 3	Site 6
Overlapping invoic 25-Sep-2014	June 23, 2014 - September 19, 2014	Site 3 \$ Site 6	1,649 \$	ing timeframe were billed with 18,666	project number associated with the applicable task. Utility Agreements and Work Plans	x x						See invoice back-up					\$ 698	\$ 2,470			\$ 698	\$ 2,470					\$ 254	\$ 13
11/20/2014	Sep 20, 2014 - Nov 14 2014	4, Site 3 \$ Site 6	2,054	3,252	Utility Agreements and Work Plans	x x						See invoice back-up				\$ 264	\$ 543	\$ 1,054			\$ 543	\$ 1,318					\$ 969	\$
1/9/2015	Nov 15, 2014 - Jan 2 2015	, Site 3 \$ Site 6	1,860 \$	3,775	Utility Agreements and Work Plans	x x						See invoice back-up				\$ 341	\$ 930	\$ 1,364			\$ 930	\$ 1,705					\$ -	\$
3/25/2015	Jan 3, 2015 - Mar 13 2015	Site 3 \$:	2,868 \$	20,289	Utility Agreements and Work Plans	x x						See invoice back-up			\$ 1,148	\$ 1,040		\$ 3,348			\$ 8,850	\$ 6,389					\$ 2,871	\$ 9
6/15/2015	March 14, 2015 - Ma 15, 2015	y Site 3 \$: Site 6	2,713 \$	20,192	Utility Agreements and Work Plans	x x						See invoice back-up					\$ 6,357	\$ 4,650			\$ 6,357	\$ 10,320					\$ -	\$ 5
8/27/2015	May 16, 2015 - July 19 2015	0, Site 3 \$ 3 Site 6	8,919 \$	41,080	Utility Agreements and Work Plans	x x						See invoice back-up			\$ 5,573		\$ 3,565	\$ 2,325			\$ 12,754	\$ 16,547					\$ 7,026	\$ 22
12/28/2015	July 11, 2015 - Nov 13 2015	3, Site 3 \$ Site 6	9,612 \$	14,659	NSG Agreement and Work Plan	x x						See invoice back-up				\$ 2,670	\$ 1,163	\$ 4,004			\$ 5,723	\$ 6,674					\$ 2,727	\$ 1
	es of invoices (Nov. 13, Jan 9, 2016 - Jan 29,		o the change 2,900	in project numbers. Work perfo	ormed during the Nov. 13, 2015 - Jan. 9, 2016 timeframe was cap	otured in the first invoice	of the new pr	oject num	ber (dated	lan. 9, 2016	- Jan. 29, .	2016). See invoice back-up, legal support cost (\$750) removed									\$ 6,225						\$ 6,675	
3/2/2016	2016 Jan 30, 2016 - Mar 11	Site 6 1, Site 3 \$	\$ 3,896	11,115	NSG Agreement and Work Plan	x x						from Site 6 invoice total See invoice back-up, legal support cost (\$300) removed						\$ 2,888			\$ 1,440	\$ 5,768					\$ 2,456	\$ 2
4/13/2016	2016 Mar 12, 2016 - Apr 1	Site 6 5. Site 3 \$	\$ 5,365	8,060	NSG Agreement and Work Plan	x	x					from Site 6 invoice total			\$ 1,807			\$ 975			\$ 2,193	\$ 1,635					\$ 1,366	\$ 5
4/29/2016	2016	Site 6	\$ 3,504	15,568	Site Preparation and NSG Work Activities		x					See invoice back-up See invoice back-up, legal support cost (\$6,600) removed				\$ 5,333					\$ 1,208	\$ 4,179					\$ 2,296	\$ 6
	Apr 16, 2016-Jun10 20	Site 6	\$ 1,125	11,139	Site Preparation and NSG Work Activities		X Y					from Site 6 invoice total See invoice back-up, legal support cost (\$2,850) removed	ς -		s -	\$ 2,475	¢ -		s -		\$ 750	\$ 7,731	ς .				\$ 375	\$
7/29/2016	Jun 11, 2016-Jul 15, 20	016 Site 6	\$	9,056	NSG valv access and Excav #2, 3, 4		x					from Site 6 invoice total	Ť		Ť	\$ -	<u> </u>	\$ -	Ť	\$ -	7 730	\$ 5,628	Ť	\$ -			ŷ 3.3	\$ 3
9/22/2016	Jul 16 2016-Sep 9, 20	Site 3-I ah	6,900 0,846 \$	94,366 61,010	Heavy field work, lab costs, and field documentation**					54% 3% 1 54% 3% 1		Site 3 sample-% sample locations in each corridor (see % below**), Site 6 costs are included as Overall %	\$ 5,454 \$ 3,587 \$	-	\$ 6,908 \$ 4,543		\$ -	\$ - \$ -	\$ -	\$ -	\$ 25,450 \$ 16,738	\$ - \$ -	\$ 1,454 \$ 956		\$ 7,635 \$ 5,021	\$ - \$ -	\$ - \$ -	\$ 94 \$ 61
11/4/2016	Sept 10, 2016-Oct 14 2016		3,248 5,697 \$	594	Heavy field work, lab costs, and field documentation**					54% 3% 1 54% 3% 1		Site 3 sample-% sample locations in each corridor (see below**), Site 6 costs are included as Overall	\$ 2,703 \$ 1,825 \$		\$ 3,424 \$ 2,312		\$ - \$ -	\$ - \$ -	\$ -	\$ - \$ -	\$ 12,615 \$ 8,518	\$ - \$ -	\$ 721 \$ 487		\$ 3,785 \$ 2,555	\$ - \$ -	\$ - \$ -	\$
2/9/2017	Oct 15 2016-Jan 20 20	Site 3-Lab \$ Site 6-AECOM Site 6-Lab	5,286	24,489 491	Lab costs and field documentation**					54% 3% 1 54% 3% 1		% overall	\$ 615 \$ - \$		\$ 779	\$ -	\$ -	\$ - \$ -	\$ -	\$ -	\$ 2,868	\$ - \$ -	\$ 164	\$ -	\$ 861	\$ - \$ -	\$ -	\$ 24 \$
5/31/2017	Jan 21 2017 - May 19 2017		5,116 - \$ \$	6,723 94,014	Lab costs and field documentation**					54% 3% 1 54% 3% 1		% overall	\$ 595		\$ 754		\$ - \$ -		\$ -		\$ 2,776		\$ 159 \$ -		\$ 833			\$ 6 \$ 94
7/26/2017	May 20, 2017 - July 1 2017	Site 3-AECOM \$ 4, Site 3-Lab \$ Site 6-AECOM Site 6-Lab	- 1,170 \$ \$	2,209 (30,955)	Lab costs and field documentation**					54% 3% 1 54% 3% 1		% % overall	\$ - \$ 136		\$ - \$ 172		\$ - \$ -		\$ -		\$ - \$ 635		\$ -		\$ - \$ 190			\$ 2 \$ (30)
9/7/2017	July 15, 2017 - Aug 1: 2017	Site 3-AECOM \$ Site 3-Lab Site 6-AECOM Site 6-Lab	- \$ \$	-	Lab costs and field documentation**					54% 3% 1 54% 3% 1		% averall	\$ -		\$ - \$ -		\$ - \$ -		\$ -		\$ - \$ -		\$ - \$ -		\$ - \$ -			\$
10/11/2017	Aug 12, 2017 - Sept 8 2017	Site 3-AECOM \$	\$	-	Lab costs and field documentation**					54% 3% 1 54% 3% 1		% % overall	\$ -		\$ -		\$ -		\$ -		\$ - \$ -		\$ - \$ -		\$ - \$ -			\$

* Invoices from April 28, 2007-August 9, 2013 include Site 4/5 and Site 6 as the same task.

When the primary work a	ctivity during the	e invoice period v	was planning, remedial alternative evaluation, or regulatory support, and equal amount of effort was spent on Site 4/5 and Site 6 tasks. Site 4/5 costs (assume 50% of total task) are removed
	Site 4/5	Site 6	
% of work effort	50%	50%	
When the primary work a	ctivity during the	e invoice period v	was investigation, the amount of effort spent on Site 4/5 and Site 6 tasks depended on the number of grids that were being investigated. Below is a summary of Site 4/5 and Site 6 grids used for cost bas
	Site 4/5	Site 6	
Total Grids within Site	161	88	
0/ of total Gride within Site	CEO/	20/	1

Heavy construction (Jan 16, 2016-Oct 14, 2016), lab costs, and field documentation (Jan 16 - Sept 8, 2017) shown in bold use the below basis SITE 3 - cost basis during heavy construction and field documentation (% based sample locations)

	Sample locations	% of total
AT&T	0	0%
ComEd	0	0%
NE Corner	4	3%
Nicor	15	12%
North Shore	70	54%
Water Main	19	15%
Ramp	21	16%
Total Locations	129	100%

Total Locations 129 100%

Note that duplicate samples and second analyses are not counted as separate sample locations

SITE 6 - cost basis Costs included in Overall Site 6

Elect Ederot conflict Friting Received, Clearly to 16/10/12

Table 2 Site 3 Completion Costs, Southwestern Sites Area of Concern, Waukegan, IL

Estimate Documentation:

							ith NSG Clean orridor
2.0 Site 3 Excavation and Capping	Quantity	UOM Material	Labor	Equip	Sub Bid	Extended Cost	Subtotal
1.1 Site Preparation							
1.1.1 Surveying, Staking, Utility Identification, & JULIE Call	0 LS	\$0.00	\$0.00	\$0.00 \$	117,650.00	\$0.00	
1.1.2 Establish & Maintain Stormwater Controls	0 LS	\$0.00	\$0.00	\$0.00 \$	6,970.00	\$0.00	
1.1.3 Traffic Control Plan Development & Implementation	0 LS	\$0.00	\$0.00	\$0.00 \$	57,220.00	\$0.00	
1.1.4 Clearing and Grubbing	0 LS	\$0.00	\$0.00	\$0.00 \$	5,970.00	\$0.00	
1.2 Excavation & Backfilling							
1.2.1 Excavation within 18 inches of gas line	0 LS	\$0.00	\$0.00	\$0.00 \$	42,125.00	\$0.00	
1.2.2 Other Excavation up to 5 ft deep	0 LS	\$0.00	\$0.00	\$0.00 \$	13,195.00	\$0.00	
1.2.3 Dewatering for Excavation & Sampling	0 wee	eks \$0.00	\$0.00	\$0.00 \$	14,080.00	\$0.00	
1.2.4 Haul Excavated Material to Industrial Canal	0 LS	\$0.00	\$0.00	\$0.00 \$	46,415.00	\$0.00	
1.2.5 Dispose or Scrap abandoned utilities	0 LS	\$0.00	\$0.00	\$0.00 \$	5,690.00	\$0.00	
1.2.6 Geotextile Procurement & Placement in Excavations	0 LS	\$0.00	\$0.00	\$0.00 \$	11,012.50	\$0.00	
1.2.7 Backfill with Quarry Sand	0 CY	\$0.00	\$0.00	\$0.00 \$	30.00	\$0.00	
1.3 Cap Construction							
1.3.1 Geotextile Procurement & Placement for Cap	0 LS	\$0.00	\$0.00	\$0.00 \$	26,540.00	\$0.00	
1.3.2 Install 6-inch Sand Layer	0 LS	\$0.00	\$0.00	\$0.00 \$	28,340.00	\$0.00	
1.3.3 Sampling and Analysis of Clay & Import Import	0 LS	\$0.00	\$0.00	\$0.00 \$	140,163.00	\$0.00	
1.3.4 Install 15-inch Compacted Clay Layer	0 LS	\$0.00	\$0.00	\$0.00 \$	58,614.20	\$0.00	
1.3.5 Sampling and Analysis of Sand/Compost & Import	0 LS	\$0.00	\$0.00	\$0.00 \$	39,009.20	\$0.00	
1.3.6 Install 3-inch Sand/Compost Layer	0 LS	\$0.00	\$0.00	\$0.00 \$	15,870.00	\$0.00	
1.3.7 Implement & Maintain Stormwater Controls to Prevent Erosion	0 LS	\$0.00	\$0.00	\$0.00 \$	10,000.00	\$0.00	
1.3.8 Establish Thriving Vegetative Cover	0 LS	\$0.00	\$0.00	\$0.00 \$	10,447.00	\$0.00	
Retainage (10%)	0 LS	\$0.00	\$0.00	\$0.00 \$	83,420.78	\$0.00	

\$0.00

Elect Ederot conflict Friting Received, Clearly to 16/10/12

Table 2 Site 3 Completion Costs, Southwestern Sites Area of Concern, Waukegan, IL

3.0 Site 3 - Water Main Activities (10% of SW Sites total)	Quantity UOM	Vlaterial	Labor	Equip	Sub Bid		
2.1 Site Propagation							
3.1 Site Preparation 3.1.1 Surveying, Staking, Utility Identification, & JULIE Call	0 LS	\$0.00	\$0.00	\$0.00 \$	12,985.00	\$0.00	
	0 LS 0 LS				,	\$0.00 \$0.00	
3.1.2 Establish & Maintain Stormwater Controls		\$0.00	\$0.00	\$0.00 \$	1,200.00		
3.1.3 Traffic Control Plan Development & Implementation	0 LS	\$0.00	\$0.00	\$0.00 \$	10,000.00	\$0.00	
3.2 Dewatering							
3.2.1 Install well point dewatering system for pipeline installation	0 LS	\$0.00	\$0.00	\$0.00 \$	18,545.34	\$0.00	
3.2.2 Operate well point dewatering system	0 weeks	\$0.00	\$0.00	\$0.00 \$	5,335.00	\$0.00	
3.2.3 Discharge cost	0 K gallons	\$0.00	\$0.00	\$0.00	\$1.16	\$0.00	
8.3 Install Casings beneath Greenwood Ave							
3.3.1 Excavate through Greenwood Avenue at 2 Locations	0 LS	\$0.00	\$0.00	\$0.00 \$	2,402.00	\$0.00	
3.3.2 Install two 8-inch steel casings beneath Greenwood Ave	0 LS	\$0.00	\$0.00	\$0.00 \$	507.40	\$0.00	
3.3.3 Backfill and Resurface Greenwood Ave to match Existing Conditions	0 LS	\$0.00	\$0.00	\$0.00 \$	1,751.00	\$0.00	
8.4 Establish Temporary Water Service to NRG and JM							
3.4.1 Excavate & Install Concrete Manhole Over Pipe Transition	0 LS	\$0.00	\$0.00	\$0.00 \$	362.25	\$0.00	
3.4.2 Transition from Transite to C900 PVC Pipe	0 LS	\$0.00	\$0.00	\$0.00 \$	509.46	\$0.00	
3.4.3 Install Temporary 4 inch HDPE Water Service to NRG	0 LS	\$0.00	\$0.00	\$0.00 \$	4,173.42	\$0.00	
3.4.4 Install Temporary 2 inch HDPE Water Service to JM	0 LS	\$0.00	\$0.00	\$0.00 \$	1,222.00	\$0.00	
3.4.5 Reinstate NRG & JM below grade Water Service	0 LS	\$0.00	\$0.00	\$0.00 \$	424.50	\$0.00	
3.5 Excavation & Backfilling							
3.5.1 Excavate and Remove Transite Pipe, valves, and hydrants	0 LS	\$0.00	\$0.00	\$0.00 \$	8,728.00	\$0.00	
3.5.2 Haul asbestos impacted soil to Industrial Canal	0 LS	\$0.00	\$0.00	\$0.00 \$	1,086.25	\$0.00	
3.5.3 Procure 10-inch C900 DR18 PVC Pipe	0 LS	\$0.00	\$0.00	\$0.00 \$	4,199.50	\$0.00	
3.5.4 Install 10-inch C900 DR18 PVC Pipe	0 LS	\$0.00	\$0.00	\$0.00 \$	29,534.00	\$0.00	
3.5.5 Install new valves	0 LS	\$0.00	\$0.00	\$0.00 \$	899.03	\$0.00	
3.5.6 Install new fire hydrants	0 LS	\$0.00	\$0.00	\$0.00 \$	1,736.85	\$0.00	
3.5.7 Backfill with Excavated Sand	0 LS	\$0.00	\$0.00	\$0.00 \$	9,596.50	\$0.00	
3.5.8 Backfill with Borrow Pit Sand	0 LS	\$0.00	\$0.00	\$0.00 \$	1,661.25	\$0.00	
3.5.9 Dispose or Scrap abandoned utilities, valves, and hydrants	0 LS	\$0.00	\$0.00	\$0.00 \$	569.00	\$0.00	
3.5.10 Load, Haul, and Dump Transite Pipe at Landfill	0 LS	\$0.00	\$0.00	\$0.00 \$	1,218.75	\$0.00	
3.5.11 Pressure Test C900 Pipe System	0 LS	\$0.00	\$0.00	\$0.00 \$	1,800.00	\$0.00	
3.5.12 Establish Thriving Vegetative Cover	0 LS	\$0.00	\$0.00	\$0.00 \$	808.80	\$0.00	
Erosion repair	1 LS	\$0.00	\$0.00	\$0.00 \$	8,000.00	\$10,000.00	

\$10,000.00

Elect Ederot conflict Friting Received, Clearly to 16/10/12/10/13/2019

Table 2 Site 3 Completion Costs, Southwestern Sites Area of Concern, Waukegan, IL

03 A	bandonment Costs Description	Quantity	HOM I	Material	Labor	Equip	Sub Bid		
	Utility abandonment fees - north shore gas & ATT	1 LS		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
	Chain-link fencing	0 LF		\$0.00	\$0.00	\$0.00	\$30.00	\$0.00	
	Excavator with Operator	0 DA	·Υ	\$0.00	\$1,000.00		\$0.00	\$0.00	
	Laborer	0 DA		\$0.00	\$1,000.00	\$0.00	\$0.00	\$0.00	
	Install well point dewatering system	0 LS		\$0.00	\$0.00	\$0.00 \$	18,545.34	\$0.00	
	Operate well point dewatering system	0 we		\$0.00	\$0.00	\$0.00 \$	5,335.00	\$0.00	
	Discharge cost to NSWRD		gallons	\$0.00	\$0.00	\$0.00	\$1.16	\$0.00	
	PCB Wipe samples with 1-day TAT	0 EA	-	\$0.00	\$0.00	\$0.00	\$120.00	\$0.00	
	Pipe Disposal Cost	0 Lo		\$0.00	\$0.00	\$0.00	\$6,000.00	\$0.00	
	Hydroexcavation of materials within 1.5 ft of pipe	0 da		\$0.00	\$0.00	\$0.00	\$2,500.00	\$0.00	
	Pipe bracing for soil excavation under gas main	0 LS	•	\$0.00	\$0.00	\$0.00	\$50,000.00	\$0.00	
	North Shore Gas - watch and protect	0 da		\$0.00	\$1,200.00	\$0.00	\$0.00	\$0.00	
	Pre-construction clean corridor investigation	0 da	,	\$400.00	\$1,200.00	\$800.00	\$2,400.00	\$0.00	
	Pre-construction clean corridor lab analyses	0 ea	•	\$0.00	\$0.00	\$0.00	\$150.00	\$0.00	
	Clean corridor confirmation sampling with drill rig	0 da		\$0.00	\$1,200.00	\$800.00	\$2,400.00	\$0.00	
	Clean Corridor Soil Confirmation Lab Analyses	0 da	•	\$0.00	\$0.00	\$0.00	\$150.00	\$0.00	
	Sampling Support for Clean Corridor Sampling	0 da		\$0.00	\$1,200.00	\$0.00	\$0.00	\$0.00	
	Haul surficial mat'l to Black ditch for NSG (0-2')	0 cy	y	\$0.00	\$0.00	\$6.00	\$0.00	\$0.00	
	Haul clean corridor excavated material to Black Ditch (2-6')	0 cy		\$0.00	\$0.00	\$6.00	\$0.00	\$0.00	
	Clean corridor backfill	0 cy		\$0.00	\$0.00	\$20.00	\$0.00	\$0.00	
	Cican contact packani	o cy		ψ0.00	ψ0.00	Ψ20.00	ψ0.00	ψ0.00	\$
4 Ma	anagement, Regulatory Support, Oversight								
, L IVI a	Description	Quantity	UOM I	Material	Labor	Equip	Sub Bid		
	AECOM - Regulatory support (2018)	12 Da		\$0.00	\$1,500.00	\$0.00	\$0.00	\$18,000.00	
	DMP - Regulatory support (2018)	12 Da	•	\$0.00	\$1,500.00	\$0.00	\$0.00	\$18,000.00	
	Final site survey	1	LS	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00	
	Completion report (DMP)	1	LS	\$0.00	\$0.00	\$0.00	\$4,387.50	\$4,387.50	
	Completion report (AECOM)	1	LS	\$0.00	\$0.00	\$0.00	\$15,233.75	\$15,233.75	
	Response to Agency comments on Completion report	1	LS	\$0.00	\$0.00	\$0.00	\$10,000.00	\$10,000.00	
		·		Ψ0.00	ψ0.00	ψ0.00	ψ10,000.00	Ψ10,000.00	\$70,62
	Description	Quantity	UOM I	Material	Labor	Equip	Sub Bid		
	Performance bond cost (Fraction pertaining to Site 3)	0 LS		\$0.00	\$0.00	\$0.00	\$6,263.00	\$0.00	

\$ 80,621

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Table 3
Site 6 Completion Costs, Southwestern Sites Area of Concern, Waukegan, IL

Estimate Documentation:

2.0 Site 6 Excavation and Filling	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost	Subtotal
2.1 Site Preparation								
2.1.1 Surveying, Staking, Utility Identification, & JULIE Call	0	LS	\$0.00	\$0.00	\$0.00 \$	67,150.00	\$0.00	
2.1.2 Establish & Maintain Stormwater Controls	0	LS	\$0.00	\$0.00	\$0.00 \$	19,940.00	\$0.00	
2.1.3 Traffic Control Plan Development & Implementation	0	LS	\$0.00	\$0.00	\$0.00 \$	3,470.00	\$0.00	
2.1.4 Clearing and Grubbing including Tree & Stump Removal	0	LS	\$0.00	\$0.00	\$0.00 \$	5,000.00	\$0.00	
2.2 Excavation & Backfilling								
2.2.1 Excavation to 3 ft deep	0	LS	\$0.00	\$0.00	\$0.00 \$	23,562.50	\$0.00	
2.2.2 Dewatering for Excavation & Sampling	0	LS	\$0.00	\$0.00	\$0.00 \$	196,000.00	\$0.00	
2.2.3 Haul Excavated Material to Industrial Canal	0	LS	\$0.00	\$0.00	\$0.00 \$	59,500.00	\$0.00	
2.2.4 Geotextile Procurement & Placement in Excavations	0	LS	\$0.00	\$0.00	\$0.00 \$	23,140.00	\$0.00	
2.2.5 Backfill with Borrow Pit Sand	0	CY	\$0.00	\$0.00	\$0.00 \$	30.00	\$0.00	
2.2.6 Dispose or Scrap abandoned utilities	0	LS	\$0.00	\$0.00	\$0.00 \$	5,690.00	\$0.00	
2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion	0	LS	\$0.00	\$0.00	\$0.00 \$	10,000.00	\$0.00	
2.2.8 Establish Thriving Vegetative Cover	0	LS	\$0.00	\$0.00	\$0.00 \$	8,425.00	\$0.00	
Erosion repair	0	LS	\$0.00	\$0.00	\$0.00	\$10,000.00	\$0.00	
Retainage (10%)	0	LS	\$0.00	\$0.00	\$0.00	\$51,995.14	\$0.00	
Contractor Health and Safety Officer	0 da	у	\$0.00	\$0.00	\$0.00 \$	1,100.00	\$0.00	**

\$0.00

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Table 3
Site 6 Completion Costs, Southwestern Sites Area of Concern, Waukegan, IL

0 Site 6 - Water Main Activities (90% of SW Sites total)	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost	Subtot
1 Site Preparation								
1.1 Surveying, Staking, Utility Identification, & JULIE Call	0 LS		\$0.00	\$0.00	\$0.00 \$	60,435.00	\$0.00	
1.2 Establish & Maintain Stormwater Controls	0 LS		\$0.00	\$0.00	\$0.00 \$	10,800.00	\$0.00	
1.3 Traffic Control Plan Development & Implementation	0 LS		\$0.00	\$0.00	\$0.00 \$	90,000.00	\$0.00	
					\$	-		
2 Dewatering					\$	-		
2.1 Install well point dewatering system for pipeline installation	0 LS		\$0.00	\$0.00	\$0.00 \$	166,908.06	\$0.00	
2.2 Operate well point dewatering system	0 weeks	S	\$0.00	\$0.00	\$0.00 \$	53,350.00	\$0.00	
2.3 Discharge cost	0 K galle	ons	\$0.00	\$0.00	\$0.00	\$1.16	\$0.00	
3 Install Casings beneath Greenwood Ave								
3.1 Excavate through Greenwood Avenue at 2 Locations	0 LS		\$0.00	\$0.00	\$0.00 \$	21,618.00	\$0.00	
3.2 Install two 8-inch steel casings beneath Greenwood Ave	0 LS		\$0.00	\$0.00	\$0.00 \$	4,566.60	\$0.00	
3.3 Backfill and Resurface Greenwood Ave to match Existing Condition	0 LS		\$0.00	\$0.00	\$0.00 \$	15,759.00	\$0.00	
4 Establish Temporary Water Service to NRG and JM								
4.1 Excavate & Install Concrete Manhole Over Pipe Transition	0 LS		\$0.00	\$0.00	\$0.00 \$	3,260.25	\$0.00	
4.2 Transition from Transite to C900 PVC Pipe	0 LS		\$0.00	\$0.00	\$0.00 \$	4,585.14	\$0.00	
4.3 Install Temporary 4 inch HDPE Water Service to NRG	0 LS		\$0.00	\$0.00	\$0.00 \$	37,560.74	\$0.00	
4.4 Install Temporary 2 inch HDPE Water Service to JM	0 LS		\$0.00	\$0.00	\$0.00 \$	10,998.00	\$0.00	
4.5 Reinstate NRG & JM below grade Water Service	0 LS		\$0.00	\$0.00	\$0.00 \$	3,820.50	\$0.00	
5 Excavation & Backfilling								
5.1 Excavate and Remove Transite Pipe, valves, and hydrants	0 LS		\$0.00	\$0.00	\$0.00 \$	78,552.00	\$0.00	
5.2 Haul asbestos impacted soil to Industrial Canal	0 LS		\$0.00	\$0.00	\$0.00 \$	9,776.25	\$0.00	
5.3 Procure 10-inch C900 DR18 PVC Pipe	0 LS		\$0.00	\$0.00	\$0.00 \$	37,795.50	\$0.00	
5.4 Install 10-inch C900 DR18 PVC Pipe	0 LS		\$0.00	\$0.00	\$0.00 \$	265,806.00	\$0.00	
5.5 Install new valves	0 LS		\$0.00	\$0.00	\$0.00 \$	8,091.23	\$0.00	
5.6 Install new fire hydrants	0 LS		\$0.00	\$0.00	\$0.00 \$	15,631.65	\$0.00	
5.7 Backfill with Quarry Sand	0 CY		\$0.00	\$0.00	\$0.00 \$	30.00	\$0.00	
5.8 Backfill with Borrow Pit Sand	0 LS		\$0.00	\$0.00	\$0.00 \$	14,951.25	\$0.00	
5.9 Dispose or Scrap abandoned utilities, valves, and hydrants	0 LS		\$0.00	\$0.00	\$0.00 \$	5,121.00	\$0.00	
5.10 Load, Haul, and Dump Transite Pipe at Landfill	0 LS		\$0.00	\$0.00	\$0.00 \$	10,968.75	\$0.00	
5.11 Pressure Test C900 Pipe System	0 LS		\$0.00	\$0.00	\$0.00 \$	16,200.00	\$0.00	
5.12 Establish Thriving Vegetative Cover	0 LS		\$0.00	\$0.00	\$0.00 \$	7,279.20	\$0.00	
etainage (10%)	0 LS		\$0.00	\$0.00	\$0.00 \$	222,122.11	\$0.00	
ontractor Health and Safety Officer	0 day		\$0.00	\$0.00	\$0.00 \$	1,100.00	\$0.00	
								\$0

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Table 3 Site 6 Completion Costs, Southwestern Sites Area of Concern, Waukegan, IL

.0 Utilities	s Abandonment Costs								
	Description	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost	Subtota
	Utility abandonment fees - north shore gas & ATT	1 LS		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
	Chain-link fencing	0 LF		\$0.00	\$0.00	\$0.00	\$30.00	\$0.00	
	Excavator with Operator	0 DAY		\$0.00	\$1,000.00	\$2,000.00	\$0.00	\$0.00	
	Laborer	0 DAY		\$0.00	\$1,000.00	\$0.00	\$0.00	\$0.00	
	Install well point dewatering system	0 LS		\$0.00	\$0.00	\$0.00 \$	18,545.34	\$0.00	
	Operate well point dewatering system	0 wee	ks	\$0.00	\$0.00	\$0.00 \$	5,335.00	\$0.00	
	Site Restoration for AT&T fiber optic relocation	1 LS		\$0.00	\$0.00	\$0.00	\$15,000.00	\$15,000.00	
									\$15,000.00
5.0 Project	Management, Regulatory Support, Oversight								
	Description	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost	Subtota
	DMP - RSE - 2018 support cost	2 Day	S	\$0.00	\$4,000.00	\$0.00	\$0.00	\$8,000.00	
	DMP - Completion Report & Final Site survey	1 LS		\$0.00	\$9,249.57	\$0.00	\$0.00	\$9,249.57	
	AECOM - Closure report support	1 LS		\$0.00	\$16,000.00	\$0.00	\$0.00	\$16,000.00	
	Response to Agency comments	1 LS		\$0.00	\$10,000.00	\$0.00	\$0.00	\$10,000.00	
	AECOM - utility agreements, covenant support	1 LS		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
	Regulatory Site visit support	1 LS		\$0.00	\$10,000.00	\$0.00	\$0.00	\$10,000.00	
									\$53,249.57
6.0 Bond									
	Description	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost	
	Performance bond cost (Fraction pertaining to Site 6)	0 LS		\$0.00	\$0.00	\$0.00	\$13,274.00	\$0.00	
									\$0.00

Construction Cost Estimate \$ 68,249.57

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30-Year O&M Costs, Southwestern Sites Area of Concern, Waukegan, IL

Cost Over Time Report (With Markups)

Folder: JM Waukegan Reserve Estimates

Project Name: Southwestern Sites Location: WAUKEGAN, IL Project ID: Southwestern Sites Report Option: Calendar

3.10% 20-year average rate of change, based on ENR index 10678 April 2017, ENR Construction Cost Index Escalation Rate

ENR Construction Cost Index - 2017 ENR Construction Cost Index - 1997 5799 April 1997, ENR Construction Cost Index

Name: Tat Ebihara

Senior Project Manager

Agency/Org./Office:

AECOM 100 S Wacker Dr. Suite 500, Chicago, IL 60606 Business Address:

312.577.7429 Phone:

Email: tat.ebihara@aecom.com

Prepared Date:

Technology Name	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	Row Total
Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	
Operations and Maintenance	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$187,107
Sub-Total	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$6,237	\$187,107
Escalation Factor	1.031	1.063	1.096	1.130	1.165	1.201	1.238	1.277	1.316	1.357	1.399	1.442	1.487	1.533	1.581	1.630	1.680	1.732	1.786	1.841	1.898	1.957	2.018	2.080	2.145	2.211	2.280	2.351	2.424	2.499	
Total	\$6,430	\$6,630	\$6,835	\$7,047	\$7,265	\$7,490	\$7,723	\$7,962	\$8,209	\$8,463	\$8,726	\$8,996	\$9,275	\$9,562	\$9,859	\$10,164	\$10,479	\$10,804	\$11,139	\$11,484	\$11,840	\$12,207	\$12,586	\$12,976	\$13,378	\$13,793	\$14,220	\$14,661	\$15,115	\$15,584	\$310,903

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Table 5
Annual O&M Cost Basis, Southwestern Sites Area of Concern, Waukegan, IL

Phase Documentation:

Phase Type: SW Sites
Phase Name: O&M

Description: O&M Utiliites coordination and Cap Maintenance

Technology:	Operations and Maintenance							
Element:	Misc. Support Cost							
Phase	Description	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost
33220105	Engineer III	24	HR	\$0.00	\$115.00	\$0.00	\$0.00	\$2,760.00
33220106	Engineer IV	4	HR	\$0.00	\$135.00	\$0.00	\$0.00	\$540.00
33220113	Project Administrator II	4	HR	\$0.00	\$80.00	\$0.00	\$0.00	\$320.00
33220152	Technician II	8	HR	\$0.00	\$65.00	\$0.00	\$0.00	\$520.00
33220164	Scientist III	0	HR	\$0.00	\$95.00	\$0.00	\$0.00	\$0.00
33220170	Project Director IV	2	HR	\$0.00	\$175.00	\$0.00	\$0.00	\$350.00
33240101	Other Direct Costs	1	LS	\$375.00	\$0.00	\$0.00	\$0.00	\$375.00
						Total E	lement Cost:	\$4,865.00
Element:	Cap Maintenance							
Phase	Description	Quantity	UOM	Material	Labor	Equip	Sub Bid	Extended Cost
18010412	Construction Signs	4	SF	\$43.73	\$0.00	\$0.00	\$0.00	\$174.90
95010135	Rip-Rap 6 inch	15	TON	\$0.00	\$0.00	\$0.00	\$35.00	\$525.00
95010234	SW Sites Field Mowing - Annual Allowance	1	LS	\$0.00	\$0.00	\$0.00	\$229.00	\$229.00
	SW Sites Cover Repair & Road Maintenance -							
95010235	Annual Allowance	1	LS	\$0.00	\$0.00	\$0.00	\$229.00	\$229.00
95010236	SW Sites Fence Repair - Annual Allowance	1	LS	\$0.00	\$0.00	\$0.00	\$100.00	\$100.00
	SW Sites Hand Removal of Woody Vegetation -							
95010237	Annual Allowance	1	LS	\$0.00	\$0.00	\$0.00	\$114.00	\$114.00
							lement Cost:	\$1,371.90
						Total 1st Yea	ar Tech Cost:	\$6,236.90

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Attachment A

Narrative Descriptions of Invoiced Costs to JM from April 28, 2007 to September 8, 2017

LFR Invoices from April 28, 2007 – December 28, 2007 period

- 1. Primary work activity during this timeframe was the Engineering Evaluation and Cost Analysis (EE/CA) Investigation Planning.
- 2. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was expended on Site 4/5 and Site 6 EE/CA Investigation Planning; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 3. Work associated with Site 3 or Site 6 was not performed during the following timeframe: June 1, 2007 to June 29, 2007.

LFR Invoices from December 29, 2007 – June 27, 2008 period

- 1. Primary work activity during this timeframe was the field investigation and preparation of the EE/CA Report (Revision 0) submitted to USEPA on June 13, 2008.
- 2. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. The amount of effort expended during the Field Investigation Work and preparation of the EE/CA Report (Revision 0) depended on the number of grids that were sampled. During the EE/CA investigation, a total of 161 grids were sampled in Site 4/5, and a total of 88 grids were sampled in Site 6. The costs associated with Site 4/5 are assumed to be proportional to the number of grids sampled (161/249=65%). Site 4/5 costs (assumed 65% of total task) were removed.

LFR/ Arcadis (formerly LFR) Invoices from June 28, 2008 - April 24, 2011

- 1. Primary work activity during this timeframe was the EE/CA Response to regulatory comments. The final EE/CA (Revision 4) was submitted to USEPA on April 11, 2011.
- 2. Arcadis acquired LFR. Invoices use both LFR and Arcadis names from 2009-2012.
- 3. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 EE/CA Response to regulatory comments; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 4. Work associated with Site 3 or Site 6 was not performed during the following timeframes: June 28, 2008 July 25, 2008, February 22, 2009 May 31, 2009, July 6, 2009 August 30, 2009, October 5, 2009 January 24, 2010, and August 23, 2010 September 26, 2010.

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LFR/ Arcadis (formerly LFR) Invoices from April 25, 2011 - August 19, 2012 period

- 1. Primary work activity during this timeframe was the Post-EE/CA Regulatory Support. Note that both Arcadis and AECOM worked on project during transition period from February 6, 2012 (AECOM start date) August 19, 2012 (Arcadis end date).
- 2. Arcadis acquired LFR. Invoices use both LFR and Arcadis names from 2009-2012.
- 3. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Post-EE/CA Regulatory Support; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 4. Work associated with Site 3 or Site 6 was not performed during the following timeframes: April 25, 2011 August 21, 2011, September 26, 2011 October 23, 2011, November 21, 2011 January 22, 2011, February 20, 2012 May 20, 2012, and June 25, 2012 August 19, 2012.

AECOM Invoices from February 6, 2012 - December 7, 2012 period

- 1. Primary work activity during this timeframe was the Post-EE/CA Regulatory Support. The Enforcement Action Memorandum was issued by USEPA on November 30, 2012. Note that both Arcadis and AECOM worked on project during transition period from February 6, 2012 (AECOM start date) August 19, 2012 (Arcadis end date)
- 2. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Post-EE/CA Regulatory Support; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 3. Work associated with Site 3 or Site 6 was not performed during the following timeframes: June 30, 2012 October 12, 2012 and November 10, 2012 December 7, 2012.

AECOM Invoices from December 8, 2012 - March 11, 2013 period

- 1. Primary work activity during this timeframe was the Removal Action Work Plan.
- 2. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Removal Action Work Plan; therefore, Site 4/5 costs (assumed 50% of total task) were removed.

AECOM Invoice #37337583 dated April 29, 2013 (March 12, 2013 – April 19, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Utility owner meetings were conducted beginning in March 2013 to finalize approach with regard to either utility relocation, abandonment, or creating clean corridors.
- 2. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Utility Agreements & Work Plans; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

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4. Todd Frauhiger has worked on underground utilities tasks and Andrew Hable worked on in water conveyance piping tasks. These staff members were utilized during the invoice period to address specific gas utilities and water main issues as noted on a copy of the invoice.

AECOM Invoice #37344868 dated May 22, 2013 (April 20, 2013 – May 17, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Utility Agreements & Work Plans; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Andrew Hable worked on water conveyance piping tasks, and Matt Mesarch worked on subsurface investigation tasks. These staff members were utilized during the invoice period to address specific gas utilities and water main issues as noted on a copy of the invoice.

AECOM Invoice #37352067 dated June 14, 2013 (May 18, 2013 – June 7, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Utility Agreements & Work Plans; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Todd Frauhiger worked on underground utilities tasks, and Andrew Hable worked on water conveyance piping tasks. Matt Mesarch and Martin Weber worked on field investigation tasks. These staff members were utilized during the invoice period to address specific gas utilities and water main issues as noted on a copy of the invoice.

AECOM Invoice #37370125 dated August 20, 2013 (June 8, 2013 – August 9, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 25 "Southwestern Sites AOC Site 3 Work" and task 26 "Southwestern Sites AOC Site 4, 5, and 6 Work." Task 25 includes costs associated with Site 3 work. Task 26 includes both costs associated with Site 4/5 and Site 6 work. An approximately equal amount of effort was spent on Site 4/5 and Site 6 Utility Agreements & Work Plans; therefore, Site 4/5 costs (assumed 50% of total task) were removed.
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Matt Mesarch, Matt Kyrias, and Martin Weber developed plans and conducted field investigation activities, including subcontractors, for the Nicor gas main corridor in Site 3.
- 4. Hsing-Hua Chu and Andrew Hable worked on water main piping design tasks as noted on a copy of the invoice.

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AECOM Invoice #37381058 dated September 27, 2013 (August 10, 2013 - September 20, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering."
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Matt Kyrias performed field investigation activities and data compilation for the Nicor gas main corridor in Site 3.
- 4. Hsing-Hua Chu and Andrew Hable worked on water main piping design tasks as noted on a copy of the invoice.
- 5. .

AECOM Invoice #37385674 dated October 17, 2013 (September 21, 2013 – October 11, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering."
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Matt Kyrias performed data compilation and reporting activities for the Nicor gas main corridor in Site 3.
- 4. Hsing-Hua Chu and Andrew Hable worked on water main piping design tasks as noted on a copy of the invoice.

AECOM Invoice #37395023 dated November 20, 2013 (October 12, 2013 – November 8, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering." The Removal Action Work Plan was submitted to USEPA on November 4, 2013.
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Matt Kyrias performed data compilation and reporting activities for the Nicor gas main corridor in Site 3.
- 4. Hsing-Hua Chu and Arthur Goodfriend conducted water main activities as noted on a copy of the invoice.
- 5. Mark Fuller coordinated AT&T activities as noted on a copy of the invoice.

AECOM Invoice #37404085 dated December 23, 2013 (November 9, 2013 – December 6, 2013)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering."
- 2. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined for the invoice period. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 3. Hsing-Hua Chu and Arthur Goodfriend have expertise in water conveyance piping design conducted water main activities as noted on a copy of the invoice.

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AECOM Invoice #37414324 dated February 4, 2014 (December 11, 2013 – January 10, 2014)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Hsing-Hua Chu and Arthur Goodfriend have expertise in water conveyance piping design conducted water main activities as noted on a copy of the invoice.

AECOM Invoice #37425097 dated March 14, 2014 (January 11, 2014 – March 7, 2014)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering." The Removal Action Work Plan (Revision 1) was submitted to USEPA on January 24, 2014.
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. All work for this invoice was assigned to a "general" cost category.

AECOM Invoice #37436418 dated April 29, 2014 (March 8, 2014 – April 11, 2014)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering." The Removal Action Work Plan (Revision 2) was submitted to USEPA on March 31, 2014.
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. All work for this invoice was assigned to a "general" cost category.

AECOM Invoice #37455694 dated July 11, 2014 (April 12, 2014 - May 23, 2014)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 100 "Site 3 Engineering" and task 120 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. All work for this invoice was assigned to a "general" cost category.

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AECOM Invoice #37475770 dated September 25, 2014 (June 23, 2014 - September 19, 2014)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

AECOM Invoice #37489528 dated November 29, 2014 (September 20, 2014 - November 14, 2014)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

AECOM Invoice #37501030 dated January 9, 2015 (November 15, 2014 – January 2, 2015)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

AECOM Invoice #37519174 dated March 25, 2015 (January 3, 2014 - March 13, 2015)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Hsing-Hua Chu has expertise in water conveyance piping design and conducted water main activities as noted on a copy of the invoice.

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AECOM Invoice #37579851 dated June 15, 2015 (March 14, 2015 – May 15, 2015)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

AECOM Invoice #37617264 dated August 27, 2015 (May 16, 2015 – July 10, 2015)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering." The Removal Action Work Plan (Revision 3) was submitted to USEPA on July 8, 2015.
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Christina Bryz-Gornia and Serina Ranft conducted work activities related to North Shore Gas as identified on the invoice.
- 5. Badger Daylighting hydroexcavation utilities location services were employed to locate both North Shore Gas and City of Waukegan water mains.

AECOM Invoice #37679934 dated December 28, 2015 (July 11, 2015 – November 13, 2015)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Christina Bryz-Gornia and Serina Ranft conducted work activities related to North Shore Gas as identified on the invoice.

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AECOM Invoice #37711966 dated March 2, 2016 (January 9, 2016 - January 29, 2016)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Christina Bryz-Gornia conducted work activities related to North Shore Gas as identified on the invoice.

AECOM Invoice #37732228 dated April 13, 2016 (January 30, 2016 - March 11, 2016)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Christina Bryz-Gornia conducted work activities related to North Shore Gas as identified on the invoice.

AECOM Invoice #37741266 dated April 29, 2016 (March 12, 2015 - April 15, 2016)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.
- 4. Christina Bryz-Gornia conducted work activities related to utilities as identified on the invoice.

AECOM Invoice #37763387 dated June 14, 2016 (April 16, 2016 – June 10, 2016)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

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AECOM Invoice #37785606 dated July 29, 2016 (June 11, 2016 – July 15, 2016)

- 1. Primary work activity during this timeframe was the Utility Agreements & Work Plans. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering."
- 2. Tat Ebihara managed the AECOM team and participated in day-to-day work activities during the invoice period, and possesses detailed knowledge of staff work assignments and expertise utilized while conducting work on the Southwestern Sites Area of Concern.
- 3. Cost designation to specific categories of work activities for Site 3 or Site 6 was determined by Tat Ebihara. The remainder of the work not specifically assigned to a cost category was assigned to a "general" cost category.

AECOM Invoices from July 16, 2016 - January 20, 2017 period

- 1. Primary work activity during this timeframe was heavy field work, field work documentation and laboratory costs. Invoices include task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering.
- 2. In Site 3, the amount of effort expended for cost categories (AT&T, ComEd, NE Corner, Nicor, North Shore, Water Main and Ramp) depended on the number of samples collected from each location. The costs associated with each cost category are assumed to be proportional to the number of sample locations (see summary table below).

	Sample locations	% of total
AT&T	0	0%
ComEd	0	0%
NE Corner	4	3%
Nicor	15	12%
North Shore	70	54%
Water Main	19	15%
Ramp	21	16%

Total Locations

129

3. All Site 6 costs are included in the general Site 6 cost category. This is due to the nature of overlapping utility corridors within portion of the Site 6 road shoulders.

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AECOM Invoices from January 21, 2017 to September 8, 2017

- 1. Primary work activity during this timeframe was laboratory costs and field work documentation. Invoices include applicable charges within task 030 "Site 3 Engineering" and task 050 "Site 6 Engineering.
- 2. In Site 3, the amount of effort expended for cost categories (AT&T, ComEd, NE Corner, Nicor, North Shore, Water Main and Ramp) depended on the number of samples collected from each location. The costs associated with each cost category are assumed to be proportional to the number of sample locations (see summary table below).

	Sample locations	% of total
AT&T	0	0%
ComEd	0	0%
NE Corner	4	3%
Nicor	15	12%
North Shore	70	54%
Water Main	19	15%
Ramp	21	16%

Total Locations

129

3. All Site 6 costs are included in the general Site 6 cost category. This is due to the nature of overlapping utility corridors within portion of the Site 6 road shoulders. It should be noted that Site 6 laboratory charges included a \$30,955 credit for the July 26, 2017 invoice associated with a laboratory overcharge amount.

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Exhibit C DMP Cost Tabulation Table

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Table 1

Costs incurred during Site 3 & Site 6 Remediation Work Campanella & Sons, DMP PE PC, AT&T, NSG, NSWRD, & Fence Work

May 11, 2017

Total Co	ost			DMP PE PC	Others including	Total
		Campanella	Campanella	Engineering &	AT&T, NSWRD	Project
Line#	Work Element	Project Award	T&M	Supervision T&M	NSG & Fence	Value
1	AT&T	\$ -	\$ 53,548.37 \$	-	\$ 320,288.66	\$ 373,837.03
2	NSG	\$ 77,659.00	\$ 185,005.38 \$	-	\$ 188,521.31	\$ 451,185.69
3	NICOR	\$ 106,848.37	\$ 5,156.38 \$	-	\$ -	\$ 112,004.75
4	Dewatering	\$ 300,050.00	\$ 41,999.64 \$	-	\$ 20,766.32	\$ 362,815.96
5	NE Excavation	\$ 35,957.43 \$	- \$	-	\$ -	\$ 35,957.43
6	Water Main	\$ 25,170.20	\$ 38,240.64 \$; -	\$ -	\$ 63,410.84
7	Filling/Capping	\$ 328,983.00	\$ 461,765.85 \$	-	\$ -	\$ 790,748.85
8	Comed / Fiber Optic Cable	\$ 77,659.00 \$	- \$; -	\$ -	\$ 77,659.00
9	Site Preparation	\$ 233,870.00	\$ 37,410.43 \$	-	\$ 159,443.50	\$ 430,723.93
10	Health and Safety	\$ 77,000.00 \$	- \$; -	\$ -	\$ 77,000.00
11	Engineering	\$ - \$	-	\$ 70,030.00	\$ -	\$ 70,030.00
12	RSE, Support Crew & Guardhouse	\$ - \$	-	\$ 479,710.00	\$ -	\$ 479,710.00
		4	4 000 400 00	4	+ coo oso =o	40.000.00
13	Total	\$ 1,263,197.00	\$ 823,126.69	\$ 549,740.00	\$ 689,019.79	\$ 3,325,083.48

Notes

25

<u>Line#</u>	Work Element	Notes
14	AT&T	Includes Site 3 & Site 6 work and AT&T invoice.
15	NSG	Includes dewatering, valve access, and excavations north and south of Greenwood Ave.
16	NICOR	Includes Site 3 work to provide clean corridor.
17	Dewatering	Includes dewatering necessary to collect confirmation samples.
18	NE Excavation	Includes Site 3 work.
19	Water Main	Includes Site 3 & Site 6 work to provide clean corridor.
20	Filling/Capping	Includes Site 3 & Site 6 work, quarry sand, 3" stone, clay, and seeding.
21	Comed / Fiber Optic Cable	Includes Site 6 work south of Greenwood Ave.
22	Site Preparation	Includes Site 3 & Site 6 clearing, grubbing, storm water, traffic control, fencing, etc.
23	Health and Safety	Includes Site 3 & Site 6 work.
24	Fngineering	Includes Site 3 & Site 6 work for hid specification, permitting, meetings, off-site activity

RSE, Support Crew & Guardhouse Includes Site 3 & Site 6 work on-site as well as other concurrent activities.

Table updated October 13, 2017 Page 1 of 1

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Table 2 Costs incurred during Site 3 & Site 6 Remediation Work Campanella & Sons Southwest Sites Project Award

11, 2017															
	vation and Capping														
Line# JM PO	Item 1.1 Site Preparation		Invoiced to &	Paid by JM	AT&T	NSG	Utility/ACM Excavation	NICOR	Dewater	W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	
1	10 1.1.1 Surveying, Staking, Utility Identification, & JULIE Call			\$ 68,150.00										\$ 68,150.00	
2	20 1.1.2 Establish & Maintain Stormwater Controls			\$ 6,970.00										\$ 6,970.00	
3	30 1.1.3 Traffic Control Plan Development & Implementation			\$ 57,220.00										\$ 57,220.00	
4	40 1.1.4 Clearing and Grubbing			\$ 5,970.00										\$ 5,970.00	
	1.2 Excavation & Backfilling					1		i i			•	i		,	
5	50 1.2.1 Excavation within 18 inches of gas line			\$ 42,125.00				\$ 42,125.00							
6	60 1.2.2 Other Excavation up to 5 ft deep			\$ 13,195.00				\$ 6,786.00		\$ 2,639.00	\$ 3,770.00				
7	70 1.2.3 Dewatering for Excavation & Sampling		9	\$ 140,800.00					\$ 140,800.00						
8	80 1.2.4 Haul Excavated Material to Industrial Canal			\$ 46,415.00				\$ 23,870.57		\$ 9,283.00	\$ 13,261.43				
9	90 1.2.5 Dispose or Scrap abandoned utilities			\$ 5,690.00				\$ 2,926.29		\$ 1,138.00	\$ 1,625.71				
10	100 1.2.6 Geotextile Procurement & Placement in Excavations			\$ 11,013.00				\$ 5,663.83		\$ 2,202.60	\$ 3,146.57				
11	110 1.2.7 Backfill with Borrow Pit Sand			\$ 49,538.00				\$ 25,476.69		\$ 9,907.60	\$ 14,153.71				
	1.3 Cap Construction														
12	120 1.3.1 Geotextile Procurement & Placement for Cap			\$ 26,540.00								\$ 26,540.00			
13	130 1.3.2 Install 6-inch Sand Layer			\$ 28,340.00								\$ 28,340.00			
14	140 1.3.3 Sampling and Analysis of Clay & Import Import		5	\$ 140,163.00								\$ 140,163.00			
15	150 1.3.4 Install 15-inch Compacted Clay Layer			\$ 58,614.00								\$ 58,614.00			
16	160 1.3.5 Sampling and Analysis of Sand/Compost & Import			\$ 39,009.00								\$ 39,009.00			
17	170 1.3.6 Install 3-inch Sand/Compost Layer			\$ 15,870.00								\$ 15,870.00			
18	180 1.3.7 Implement & Maintain Stormwater Controls to Prevent Erosion											\$ 10,000.00			
				\$ 10,000.00											
20) Site Site 6	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling	Site	3 Total	\$ 10,447.00 \$ 776,069.00		x			x	x	x	x	x		\$ x
20) Site Site 6	190 1.3.8 Establish Thriving Vegetative Cover	Site		\$ 10,447.00 \$ 776,069.00	*							\$ 328,983			
20 O Site Site 6 Line# JM PO	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling	Site	3 Total \$	\$ 10,447.00 \$ 776,069.00	x	x	Utility/ACM	x	x	x	x	\$ 328,983 x	x	x	
20 O Site Site 6 Line# JM PO	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation	Site	3 Total \$	\$ 10,447.00 \$ 776,069.00 Paid by JM	x	x	Utility/ACM	x	x	x	x	\$ 328,983 x	x	x Site Prep	
O Site Site 6 Line# JM PO	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call	Site	3 Total \$	\$ 10,447.00 5 776,069.00 Paid by JM \$ 67,150.00	x	x	Utility/ACM	x	x	x	x	\$ 328,983 x	x	x Site Prep \$ 67,150.00	
20 D Site Site 6 Line# JM PO 21 22 23	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls	Site	3 Total \$	\$ 10,447.00 \$ 776,069.00 Paid by JM \$ 67,150.00 \$ 19,940.00	x	x	Utility/ACM	x	x	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00	
20 D Site Site 6 Line# JM PO 21 22 23	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation	Site	3 Total \$	\$ 10,447.00 \$ 776,069.00 Paid by JM \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	x	x	Utility/ACM	x	x	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal	Site	3 Total \$	\$ 10,447.00 \$ 776,069.00 Paid by JM \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	x	x	Utility/ACM	x	x	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 O Site Site 6 Line# JM PO 21 22 23 24	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00	x	x	Utility/ACM Excavation	x	x	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 O Site Site 6 Line# JM PO 21 22 23 24	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00	x	x	Utility/ACM Excavation	x	Dewater	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 O Site Site 6 Line# JM PO 21 22 23 24 25 26	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$159,250.00	x	x	Utility/ACM Excavation	x	Dewater	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 0 Site Site 6 Line# JM PO 21 22 23 24 25 26 27	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$159,250.00 \$59,500.00	x	x	Utility/ACM Excavation \$ 23,563.00	x	Dewater	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 O Site Site 6 Line# JM PO 21 22 23 24 25 26 27 28	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$159,250.00 \$59,500.00 \$23,140.00 \$5,500.00 \$55,500.00 \$25,600.00 \$25,600.00	x	x	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00	x	Dewater	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 Site Site 6 Line# JM PO 21 22 23 24 25 26 27 28 29 30	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow Pit Sand	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$159,250.00 \$59,500.00 \$23,140.00 \$23,140.00 \$25,000.00	x	x	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,000.00	x	Dewater	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 0 Site Site 6 Line# JM PO 21 22 23 24 25 26 27 28 29	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow Pit Sand 290 2.2.6 Dispose or Scrap abandoned utilities	Site	3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$159,250.00 \$59,500.00 \$23,140.00 \$5,500.00 \$55,500.00 \$25,600.00 \$25,600.00	x	x	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,600.00 \$ 5,690.00	x	Dewater	x	x	\$ 328,983 x	x	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	
20 Site Site 6 S	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow PIt Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion		3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$59,500.00 \$23,140.00 \$23,140.00 \$5,690.00 \$5,690.00 \$5,690.00 \$5,690.00 \$5,690.00 \$5,690.00 \$5,690.00	AT&T(1)	NSG NSG	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,000.00 \$ 5,690.00 \$ 10,000.00	NICOR	x Dewater \$ 159,250.00	W. Main	NE Ex.	\$ 328,983 x Fill/Cap	x Fib. Opt.	\$ Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00	x
20 3 Site Site 6 Site	190 1.3.8 Establish Thriving Vegetative Cover Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow PIt Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion		3 Total \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$5,470.00 \$5,500.00 \$5,500.00 \$5,500.00 \$5,500.00 \$523,140.00 \$525,000.00 \$5,690.00 \$5,690.00 \$8,425.00 \$410,128.00	AT&T(1)	NSG NSG	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,000.00 \$ 10,000.00 \$ 8,425.00 \$ 155,318	NICOR	x Dewater \$ 159,250.00	W. Main	NE EX.	\$ 328,983 x Fill/Cap	x Fib. Opt.	x Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00 \$ 5,000.00	×
20 Site Site 6 JM PO 21 22 23 24 25 26 27 28 29 30 31 32 33 alth	Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow PIt Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion 310 2.2.8 Establish Thriving Vegetative Cover	Site	3 Total \$ Invoiced to &	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$55,000.00 \$55,500.00 \$23,140.00 \$55,500.00 \$55,500.00 \$25,600.00 \$25,600.00 \$55,600.00 \$410,128.00	AT&T(1)	NSG NSG S S S S S S S S S S S S S S S S	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 25,000.00 \$ 10,000.00 \$ 8,425.00 \$ 155,318	NICOR	x Dewater \$ 159,250.00	W. Main	NE EX.	\$ 328,983 x Fill/Cap	x Fib. Opt.	x Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00 \$ 5,000.00 \$ \$ 5,000.00	\$
20 Site Site 6 Jan Po 21 22 23 24 25 26 27 28 29 30 31 32 33 31	Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow Pit Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion 310 2.2.8 Establish Thriving Vegetative Cover	Site Duration Year	3 Total \$ Invoiced to & \$ 5	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$159,250.00 \$59,500.00 \$59,500.00 \$23,140.00 \$25,000.00 \$25,000.00 \$3,470.00 \$410,128.00	AT&T(1)	NSG NSG	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 25,000.00 \$ 2,5000.00 \$ 10,000.00 \$ 8,425.00 \$ 155,318	NICOR	x Dewater \$ 159,250.00	W. Main	NE EX.	\$ 328,983 x Fill/Cap	x Fib. Opt.	x Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00 \$ 5,000.00 \$ \$ 5,000.00	\$ H&S
20 21 22 23 24 25 26 27 28 29 30 31 31 32 33 33 4alth	Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow PIt Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion 310 2.2.8 Establish Thriving Vegetative Cover	Site Duration Year 13 days	Invoiced to &	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$55,000.00 \$55,500.00 \$55,500.00 \$55,500.00 \$55,690.00 \$55,690.00 \$10,000.00 \$410,128.00	AT&T(1)	NSG NSG S S S S S S S S S S S S S S S S	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,000.00 \$ 10,000.00 \$ 8,425.00 \$ 155,318	NICOR	x Dewater \$ 159,250.00	W. Main	NE EX.	\$ 328,983 x Fill/Cap	x Fib. Opt.	x Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00 \$ 5,000.00 \$ \$ 5,000.00	\$ H&S
20 Site Site 6 S	Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow Pit Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion 310 2.2.8 Establish Thriving Vegetative Cover	Site Duration Year 13 days 57 days	3 Total \$ Invoiced to & S \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$23,140.00 \$25,900.00 \$5,690.00 \$5,690.00 \$1,100.00 \$410,128.00 Paid by JM \$14,300.00 \$62,700.00	AT&T(1) S S - X	NSG NSG	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,500.00 \$ 10,000.00 \$ 8,425.00 \$ 155,318 Utility/ACM Excavation	NICOR S S - X	x Dewater \$ 159,250.00	W. Main	NE EX.	\$ 328,983 x Fill/Cap \$ - x	x Fib. Opt.	x Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00 \$ 5,000.00 \$ 5,000.00 S 5,000.00	x
20 0 Site Site 6 Line# JM PO 21 22 23 24 25 26 27 28 29 30 31 32 33	Excavation and Filling Item 2.1 Site Preparation 200 2.1.1 Surveying, Staking, Utility Identification, & JULIE Call 210 2.1.2 Establish & Maintain Stormwater Controls 220 2.1.3 Traffic Control Plan Development & Implementation 230 2.1.4 Clearing and Grubbing including Tree & Stump Removal 2.2 Excavation & Backfilling 240 2.2.1 Excavation to 3 ft deep 250 2.2.2 Dewatering for Excavation & Sampling 260 2.2.3 Haul Excavated Material to Industrial Canal 270 2.2.4 Geotextile Procurement & Placement in Excavations 280 2.2.5 Backfill with Borrow PIt Sand 290 2.2.6 Dispose or Scrap abandoned utilities 300 2.2.7 Implement & Maintain Stormwater Controls to Prevent Erosion 310 2.2.8 Establish Thriving Vegetative Cover	Site Duration Year 13 days	3 Total \$ Invoiced to & S \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	\$10,447.00 \$776,069.00 Paid by JM \$67,150.00 \$19,940.00 \$3,470.00 \$5,000.00 \$23,563.00 \$59,500.00 \$23,140.00 \$25,900.00 \$25,000.00 \$10,000.00 \$410,128.00 Paid by JM \$14,300.00 \$62,700.00	AT&T(1) AT&T AT&T S	NSG NSG	Utility/ACM Excavation \$ 23,563.00 \$ 59,500.00 \$ 23,140.00 \$ 25,000.00 \$ 10,000.00 \$ 8,425.00 \$ 155,318	NICOR S - X	\$ 159,250.00 \$ 159,250.00 \$ Dewater	W. Main	NE EX.	\$ 328,983 x Fill/Cap \$ 5 - x Fill/Cap	x Fib. Opt.	x Site Prep \$ 67,150.00 \$ 19,940.00 \$ 3,470.00 \$ 5,000.00 \$ 95,560 x Site Prep	\$ H&S

AT&T includes telephone and fiber optic lines located on Site 6.

Table 3
Costs incurred during Site 3 & Site 6 Remediation Work
Campanella & Sons Time and Materials Invoices

May 11, 2017	7				
Line#	Date Site	Invoice# Scope of Work	Description	Quantity Unit	Unit Cost Total Cost
				,	
8	7/8/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Cat 320 Excavator	4.5 hrs	\$ 250.00 \$ 1,1
9	7/8/2015 Site 3 7/8/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering 8592 Greenwood crossing with 36 inch pipe for dewatering	Cat IT38 Loader Laborer Foreman	4.5 hrs 4.5 hrs	\$ 220.00 \$ 9 \$ 105.00 \$ 4
10	7/8/2015 Site 3 7/8/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering 8592 Greenwood crossing with 36 inch pipe for dewatering	Laborer Foreman Laborer	4.5 nrs 9 hrs	\$105.00 \$ 4
12	7/8/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Semi Dump Trailer	5 hrs	\$125.00 \$ 6
13	7/8/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	36" RCP	64 If	\$43.90 \$ 2,8
14	7/8/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Mastic	3 ea	\$ 51.75 \$ 1
15	7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Cat 320 Excavator	8.5 hrs	\$ 250.00 \$ 2,1
16 17	7/9/2015 Site 3 7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Cat IT38 Loader Laborer Foreman	8 hrs	\$ 220.00 \$ 1,7 \$ 105.00 \$ 8
18	7/9/2015 Site 3 7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering 8592 Greenwood crossing with 36 inch pipe for dewatering	Laborer Foreman Laborer	8 nrs 24 hrs	\$105.00 \$ 2,5
19	7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Semi Dump Trailer	6 hrs	\$125.00 \$ 7
20	7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Premium	118 W	\$ 6.15 \$ 7
21	7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Flowable Fill	16 cy	\$ 117.30 \$ 1,8
22	7/9/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	CA-7 Gravel	10.22 ton	\$ 17.25 \$ 1
23 24	7/10/2015 Site 3 7/10/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Cat 320 Excavator	8.5 hrs 8 hrs	\$ 250.00 \$ 2,1 \$ 105.00 \$ 8
24	7/10/2015 Site 3 7/10/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering 8592 Greenwood crossing with 36 inch pipe for dewatering	Laborer Foreman	8 hrs 16 hrs	\$ 105.00 \$ 8 \$ 105.00 \$ 1.6
26	7/10/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Semi Dump Trailer	5 hrs	\$125.00 \$ 6
27	7/10/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	CA-7 Gravel	18.75 ton	\$17.25 \$ 3
28	7/10/2015 Site 3	8592 Greenwood crossing with 36 inch pipe for dewatering	Binder Course	13.83 ton	\$ 60.40 \$ 8
129	5/16/2016 Site 3	8752 Dewatering for NSG valve access	Laborer	8 Hrs	\$110.00 \$ 8
130	5/17/2016 Site 3	8752 Dewatering for NSG valve access	Laborer	8 Hrs	\$110.00 \$ 8
131 132	5/17/2016 Site 3 5/17/2016 Site 3	8752 Dewatering for NSG valve access 8752 Dewatering for NSG valve access	NIB 3 FP Ball VLV FIP x FIP 3 Blk Mal Tee	1 Ea 1 Ea	\$ 189.41 \$ 1 \$ 77.89 \$
132	5/17/2016 Site 3	8752 Dewatering for NSG valve access	Strainer 4"	1 Ea	\$ 61.78 \$
134	5/24/2016 Site 3	8752 Maintain Pumps for NSG valve access	Laborer	8 Hrs	\$110.00 \$ 8
135	5/25/2016 Site 3	8752 Maintain Pumps for NSG valve access	Laborer	8 Hrs	\$110.00 \$ 8
136	5/26/2016 Site 3	8752 Dewatering for NSG valve access	Laborer	8 Hrs	\$110.00 \$ 8
137	5/26/2016 Site 3	8752 Haul Material to Black Ditch	Six-Wheel Dump	4 Hrs	\$110.00 \$ 4
138 139	5/27/2016 Site 3 5/27/2016 Site 3	8752 Dewatering pump installation 8752 24 hr Dewatering	JD 744H Loader Laborer	8 Hrs 20.5 Hrs	\$ 225.00 \$ 1,8 \$ 110.00 \$ 2.2
140	5/27/2016 Site 3 5/27/2016 Site 3	8752 24 hr Dewatering 8752 24 hr Dewatering	Laborer Overtime	20.5 Hrs 4.5 Hrs	\$ 30.85 \$ 1
141	5/31/2016 Site 3	8752 Maintain pumps for NSG dewatering	Laborer	8 Hrs	\$110.00 \$ 8
142	6/1/2016 Site 3	8752 Maintain pumps for NSG dewatering	Cat 938G Wheel Loader	8 Hrs	\$ 200.00 \$ 1,6
143	6/1/2016 Site 3	8752 Maintain pumps for NSG dewatering	Laborer	8 Hrs	\$110.00 \$ 8
144	6/2/2016 Site 3	8752 Maintain pumps for NSG dewatering	Cat 938G Wheel Loader	10 Hrs	\$ 200.00 \$ 2,0
145	6/2/2016 Site 3	8752 Maintain pumps for NSG dewatering	Operator Overtime	2 Hrs	\$36.60 \$
146	6/2/2016 Site 3 6/2/2016 Site 3	8752 Maintain pumps for NSG dewatering 8752 Maintain pumps for NSG dewatering	Laborer Laborer Overtime	12.5 Hrs 4.5 Hrs	\$ 110.00 \$ 1,3 \$ 30.85 \$ 1
148	6/3/2016 Site 3	8752 Install crane mats for NSG valve access	Cat 938G Wheel Loader	11.5 Hrs	\$200.00 \$ 2,3
149	6/3/2016 Site 3	8752 Install crane mats for NSG valve access	Operator Overtime	3.5 Hrs	\$36.60 \$ 1
150	6/3/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer	11.5 Hrs	\$ 110.00 \$ 1,2
151	6/3/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer Overtime	3.5 Hrs	\$30.85 \$ 1
152 153	6/6/2016 Site 3 6/6/2016 Site 3	8752 Install crane mats for NSG valve access 8752 Install crane mats for NSG valve access	Cat 938G Wheel Loader Operator Overtime	10 Hrs 2 Hrs	\$ 200.00 \$ 2,0 \$ 36.60 \$
153 154	6/6/2016 Site 3 6/6/2016 Site 3	8752 Install crane mats for NSG valve access 8752 Install crane mats for NSG valve access	Operator Overtime Laborer	2 Hrs 10 Hrs	\$ 36.60 \$ \$ 110.00 \$ 1,1
155	6/6/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer Overtime	2 Hrs	\$30.85 \$
156	6/7/2016 Site 3	8752 Install crane mats for NSG valve access	Cat 938G Wheel Loader	8 Hrs	\$ 200.00 \$ 1,6
157	6/7/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer	9.5 Hrs	\$ 110.00 \$ 1,0
158	6/7/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer Overtime	1.5 Hrs	\$ 30.85 \$
159	6/7/2016 Site 3	8752 Install crane mats for NSG valve access	Silt Fence	300 Ft	\$ 0.44 \$ 1
160 161	6/8/2016 Site 3 6/8/2016 Site 3	8752 Install crane mats for NSG valve access 8752 Install crane mats for NSG valve access	Cat 938G Wheel Loader Laborer	8 Hrs 8 Hrs	\$ 200.00 \$ 1,6 \$ 110.00 \$ 8
162	6/8/2016 Site 3 6/9/2016 Site 3	8752 Install crane mats for NSG valve access 8752 Install crane mats for NSG valve access	Cat 938G Wheel Loader	8 Hrs	\$200.00 \$ 1,6
163	6/9/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer	8.5 Hrs	\$110.00 \$ 9
164	6/9/2016 Site 3	8752 Install crane mats for NSG valve access	Laborer Overtime	0.5 Hrs	\$ 30.85 \$
165	6/10/2016 Site 3	8752 Install crane mats for NSG valve access	Cat 938G Wheel Loader	8 Hrs	\$ 200.00 \$ 1,6
166 167	6/10/2016 Site 3 6/13/2016 Site 3	8752 Install crane mats for NSG valve access 8752 Support NSG contractor Meade including dewatering	Laborer Cat 938G Wheel Loader	8 Hrs 4 Hrs	\$110.00 \$ 8 \$200.00 \$ 8
167	6/13/2016 Site 3 6/13/2016 Site 3	8752 Support NSG contractor Meade including dewatering 8752 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader Cat D6 Dozer	4 Hrs 4 Hrs	\$ 220.00 \$ 8
169	6/13/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$110.00 \$ 8
170	6/14/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader	4 Hrs	\$ 200.00 \$ 8
171	6/14/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$110.00 \$ 8
172	6/14/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	8.5 Hrs	\$110.00 \$ 9
173	6/15/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader	4 Hrs	\$ 200.00 \$ 8
174 175	6/15/2016 Site 3 6/15/2016 Site 3	8752 Support NSG contractor Meade including dewatering 8752 Support NSG contractor Meade including dewatering	Cat D6 Dozer	4 Hrs 16 Hrs	\$ 220.00 \$ 8 \$ 110.00 \$ 1.7
175	6/15/2016 Site 3 6/15/2016 Site 3	8752 Support NSG contractor Meade including dewatering 8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	9.5 Hrs	\$110.00 \$ 1,7
177	6/16/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader	8 Hrs	\$ 200.00 \$ 1,6
178	6/16/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$110.00 \$ 8
179	6/16/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	9 Hrs	\$110.00 \$ 9
180	6/17/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader	8 Hrs	\$ 200.00 \$ 1,6
181 182	6/17/2016 Site 3 6/17/2016 Site 3	8752 Support NSG contractor Meade including dewatering 8752 Support NSG contractor Meade including dewatering	Laborer Six-Wheel Dump	8 Hrs 7.5 Hrs	\$110.00 \$ 8 \$110.00 \$ 8
182	6/17/2016 Site 3 6/20/2016 Site 3	8752 Support NSG contractor Meade including dewatering 8752 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader	7.5 Hrs 8 Hrs	\$110.00 \$ 8 \$200.00 \$ 1.6
184	6/20/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$110.00 \$ 8
185	6/20/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	8 Hrs	\$110.00 \$ 8

AT&T	NSG	Utility/ACM Excavation	NICOR		W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	H&S
				\$ 1,125						
				\$ 990 \$ 473						
				\$ 945						
				\$ 625						
				\$ 2,810						
				\$ 155						
				\$ 2,125 \$ 1,760						
				\$ 1,760						
				\$ 2,520						
				\$ 750						
				\$ 726						
				\$ 1,877						
				\$ 176 \$ 2,125						
				\$ 840						
				\$ 1,680						
				\$ 625						
				\$ 323						
				\$ 835						
-	\$ 880									
-	\$ 189									
	\$ 78									
	\$ 62									
	\$ 880									
	\$ 880									
—	\$ 880 \$ 440				-	-		-	-	
<u> </u>	\$ 1,800									
	\$ 2,255									
	\$ 139									
	\$ 880									
	\$ 1,600									
	\$ 2,000									
	\$ 73									
	\$ 1,375									
	\$ 139									
	\$ 2,300 \$ 128									
	\$ 1,265									
	\$ 108									
	\$ 2,000									
	\$ 73									
	\$ 1,100 \$ 62									
	\$ 1,600									
	\$ 1,045									
	\$ 46									
	\$ 132									
<u> </u>	\$ 1,600									
-	\$ 880									
	\$ 935									
	\$ 15									
L	\$ 1,600									
	\$ 880 \$ 800									
-	\$ 880									
	\$ 880									
	\$ 800									
	\$ 880									
_	\$ 935									
—	\$ 800									
	\$ 1,760									
	\$ 1,045									
	\$ 1,600									
	\$ 880									
<u> </u>	\$ 990 \$ 1,600			-	-		-	-	-	-
<u> </u>	\$ 1,600									
	\$ 825									
	\$ 1,600									
	\$ 880									
1	\$ 880	1	1	1	1	i .	1	1	1	1

Table 3
Costs incurred during Site 3 & Site 6 Remediation Work
Campanella & Sons Time and Materials Invoices

May 11, 2017	<u> </u>					
Line#	Date Site	Invoice# Scope of Work	Acceptation (Quantity Unit	Unit Cost Tota	al Cost
Line #	Date Site	Invoice# Scope of Work	Description	Quantity Unit	Unit Cost Tota	al Cost
186	6/20/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Polyfilm	2 Rolls	\$ 109.25 \$	219
197	6/28/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	880
198	6/29/2016 Site 3	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	880
199	6/30/2016 Site 3	8752 Support NSG contractor Meade including filling	JD 744H Loader	8 Hrs	\$ 225.00 \$	1,800
200	6/30/2016 Site 3	8752 Support NSG contractor Meade including filling	Six-Wheel Dump	9 Hrs	\$ 110.00 \$	990
201	6/30/2016 Site 3	8752 Support NSG contractor Meade including filling	Laborer	8 Hrs	\$110.00 \$	880
202	7/1/2016 Site 3	8753 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	880
209	7/15/2016 Site 3	8752 Seeding NSG valve area	Laborer	1 Hrs	\$110.00 \$	110
238	8/24/2016 Site 3	8786 Excavation backfill	Trench Backfill-Sand Polyfilm 16x100-4 MIL	602.8 Ton	\$ 13.50 \$	8,138
248 249	9/1/2016 Site 3 9/1/2016 Site 3	8786 Stockpile management 8786 Stockpile management	Polyfilm 16x100-4 MIL Polyfilm 20x100-4 MIL	1 Roll	\$ 56.29 \$ \$ 70.09 \$	56 70
277	9/1/2016 Site 3 9/15/2016 Site 3		Laborer	1 Hrs	\$ 110.00 \$	1,430
277	9/16/2016 Site 3	8800 Hand dig by gas main 8800 Haul from Site 3 to Black Ditch	Cat 938G Loader	2 Hrs	\$ 200.00 \$	1,430
279	9/16/2016 Site 3	8800 Haul from Site 3 to Black Ditch	Cat 320C Excavator	2.5 Hrs	\$ 235.00 S	588
280	9/16/2016 Site 3	8800 Haul from Site 3 to Black Ditch	Laborer	2.5 Hrs	\$ 110.00 \$	220
281	9/16/2016 Site 3	8800 Haul from Site 3 to Black Ditch	Semi-Dump	1 Hrs	\$ 120.00 \$	120
282	9/16/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	260.75 Ton	\$ 13.50 \$	3,520
283	9/19/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	474.75 Ton	\$13.50 \$	6,409
284	9/20/2016 Site 3	8800 Haul tar material to landfill	Cat 320C Excavator	4.5 Hrs	\$ 235.00 \$	1,058
285	9/20/2016 Site 3	8800 Haul tar material to landfill	Laborer	4.5 Hrs	\$ 110.00 \$	495
286	9/20/2016 Site 3	8800 Haul tar material to landfill	Semi-Dump	6 Hrs	\$ 120.00 \$	720
287	9/20/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	419.7 Ton	\$ 13.50 \$	5,666
288	9/21/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	74.4 Tons	\$ 13.50 \$	1,004
295	9/28/2016 Site 3	8800 Excavation backfill	Laborer	8 Hrs	\$ 110.00 \$	880
296	9/28/2016 Site 3	8800 Excavation backfill	Semi-Dump	5 Hrs	\$ 120.00 \$	600
297	9/28/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	36.45 Ton	\$13.50 \$	492
298	9/29/2016 Site 3	8800 Excavation backfill	Semi-Dump	16 Hrs	\$ 120.00 \$	1,920
299	9/29/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	451.9 Ton	\$ 13.50 \$	6,101
300	9/30/2016 Site 3	8800 Excavation backfill	Semi-Dump	10.5 Hrs	\$ 120.00 \$	1,260
301	9/30/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	97.65 Ton	\$ 13.50 \$	1,318
302	10/3/2016 Site 3	8800 Excavation backfill	Semi-Dump	8 Hrs	\$120.00 \$	960
303	10/3/2016 Site 3	8800 Excavation backfill	Trench Backfill-Sand	114.8 Ton	\$ 13.50 \$	1,550
356	11/14/2016 Site 3	8846 Armoring clay with stone in wet area	Skidsteer at JM (Case 450CT)	2 hrs	\$ 195.00 \$	390
357	11/14/2016 Site 3	8846 Armoring clay with stone in wet area	3" Stone	60 ton	\$ 25.21 \$	1,513
210	5/16 - 7/15 Site 3	8752 Dewatering for NSG valve and pipe access	Mercino - Dewatering for NSG Valve Access	1 invoice	\$ 15,525.00 \$	15,525
211	5/16 - 7/15 Site 3	8752 Dewatering for NSG valve and pipe access	Mercino - Dewatering for NSG Valve Access	1 invoice	\$ 7,040.88 \$	7,041
212	5/16 - 7/15 Site 3	8752 Dewatering for NSG valve and pipe access	Mercino - Dewatering for NSG Valve Access	1 invoice	\$ 11,738.63 \$	11,739
213	5/16 - 7/15 Site 3	8752 Dewatering for NSG valve and pipe access	Fuel for Mercino Dewatering Pumps	1215 gallons	\$ 2.31 \$	2,808
214 215	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3	8752 Dewatering for NSG valve and pipe access	4"x50' Red Lay Flat Hose W/C&G Ends 3"x50' Red Lay Flat Hose W/C&G Ends	12 each 12 each	\$ 111.15 \$ \$ 86.36 \$	1,334 1,036
215						
216		8752 Dewatering for NSG valve and pipe access				
216	5/16 - 7/15 Site 3	8752 Crane matts for NSG valve access (5/16-6/30)	Matt Delivery & 1 Month Rental (Midwest Access)	1 invoice	\$49,676.45 \$	49,676
216 217					\$49,676.45 \$ \$13,405.69 \$	49,676 13,406
	5/16 - 7/15 Site 3	8752 Crane matts for NSG valve access (5/16-6/30)	Matt Delivery & 1 Month Rental (Midwest Access)	1 invoice	\$49,676.45 \$	49,676
	5/16 - 7/15 Site 3	8752 Crane matts for NSG valve access (5/16-6/30)	Matt Delivery & 1 Month Rental (Midwest Access)	1 invoice	\$49,676.45 \$ \$13,405.69 \$	49,676 13,406
217	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3	8752 Crane matts for NSG valve access (5/16-6/30) 8752 Crane matts for NSG valve access	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access)	1 invoice 1 invoice	\$ 49,676.45 \$ \$ 13,405.69 \$ Total \$	49,676 13,406 233,881
217	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6	8752 Crane matts for NSG valve access (5/16-6/30) 8752 Crane matts for NSG valve access 8786 Excavation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump	1 invoice 1 invoice 4 Hrs	\$ 49,676.45 \$ \$ 13,405.69 \$ Total \$ \$ 110.00 \$	49,676 13,406 233,881 440
217 222 223	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/3/2016 Site 6	8722 Crane matts for NSG valve access (5/16-6/30) 8732 Crane matts for NSG valve access 8736 Excavation backfill 8736 Excavation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six Wheel Dump 3" Stone	1 invoice 1 invoice 4 Hrs 150.94 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$	49,676 13,406 233,881 440 2,820
217 222 223 224	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/3/2016 Site 6 8/3/2016 Site 6	8752. Crane matter for NTG valve access (\$716.67.00) 8752. Crane matter for NTG valve access (\$716.67.00) 8752. Crane matter for NTG valve access 8766. Exervition backfill 8766. Exervition backfill 8766. Exervition backfill	Mast Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill-Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035
217 222 223 224 225 226 227	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/3/2016 Site 6 8/3/2016 Site 6 8/4/2016 Site 6 8/4/2016 Site 6 8/5/2016 Site 6	8752 Cane metts for NGG valve access (5/16-6/30) 8752 Cane metts for NGG valve access (5/16-6/30) 8756 Excavation backfill 8786 Excavation backfill	Mart Delivery & 1 Month Rental (Midwest Access) Mart Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill-Sand Trench Backfill-Sand Trench Backfill-Sand Trench Backfill-Sand	1 invoice 1 invoice 4 Hrs 159.94 Ton 669.25 Ton 723.80 Ton 1022.25 Ton 950.8 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836
217 222 223 224 225 226 227 228	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/3/2016 Site 6 8/3/2016 Site 6 8/4/2016 Site 6 8/4/2016 Site 6 8/8/2016 Site 6 8/8/2016 Site 6	8732. Crain enatis for Y6G valve access (3/16-6/30) 8752. Crain enatis for Y6G valve access (3/16-6/30) 8756. Execution backfill 8766. Execution backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Remoral, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill-Sand Trench Backfill-Sand Trench Backfill-Sand Trench Backfill-Sand Trench Backfill-Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 1022.25 Ton 950.8 Ton 1176.8 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887
222 223 224 225 226 227 228 229	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/3/2016 Site 6 8/3/2016 Site 6 8/4/2016 Site 6 8/5/2016 Site 6 8/5/2016 Site 6 8/5/2016 Site 6 8/5/2016 Site 6 8/5/2016 Site 6	8752 Crane metats for KTG valve access (\$716-64-00) 8752 Crane metats for KTG valve access (\$716-64-00) 8752 Crane metats for KTG valve access 8766 Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill-Sand	1 invoice 1 invoice 4 lirs 15094 Ton 66925 Ton 723.80 Ton 102225 Ton 950.8 Ton 1176.8 Ton 485.75 Ton	\$49,676.45 \$ \$13,405.69 \$ Yotal \$ \$110.00 \$ \$118.60 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558
217 222 223 224 225 226 227 228 229 230	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/5/2016 Site 6	8732 Crane matts for NGs valve access (\$/16-6/30) 8752 Crane matts for NGs valve access (\$/16-6/30) 8752 Crane matts for NGs valve access 8786 Exexvision backfill 8786 Exexvision backfill 8786 Exervision backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill-Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 1022.25 Ton 1022.25 Ton 1176.8 Ton 485.75 Ton 623.15 Ton 623.15 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$118.08 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413
222 223 224 225 226 227 228 229 230	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/3/2016 Site 6 8/11/2016 Site 6 8/11/2016 Site 6	8732. Crain emails for KTGs with access (\$716.64.00) 8752. Crain emails for KTGs with access (\$716.64.00) 8752. Crain emails for KTGs with access 8756. Exervition backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 1022.25 Ton 950.8 Ton 1176.8 Ton 687.37 Ton 687.37 Ton 623.15 Ton 528.55 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$110.00 \$ \$110.00 \$ \$115.00 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135
222 223 224 225 226 227 228 229 230 231	5/16 - 7/15 Site 3 5/16 - 7/15 Site 3 8/1/2016 Site 6 8/1/2016 Site 6	8732 Care metts for NGG valve access (5/16-6/30) 8752 Care metts for NGG valve access (5/16-6/30) 8752 Care metts for NGG valve access 8786 Exervation backfill	Mart Delivery & 1 Month Rental (Midwest Access) Mart Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 6692.5 Ton 723.80 Ton 1022.25 Ton 950.9 Ton 1176.8 Ton 1176.8 Ton 623.15 Ton 523.5 Ton 623.15 Ton 523.5 Ton 523.5 Ton 523.5 Ton	\$49,676.45 S \$13,405.69 S Total \$110.00 S \$110.00 S \$13.80 S \$13.50 S	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135
217 222 223 224 225 226 227 228 229 230 231 232 233	\$/16 - 7/15 See 3 \$/16 - 7/15 See 3 \$/3/2016 See 6 8/3/2016 See 6	8732. Crain enatists for KSG valve access (\$/16.6/40) 8732. Crain enatists for KSG valve access (\$/16.6/40) 8736. Exerution backfill	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill Sand	1 invoice 1 invoice 4 Nrs 150.94 Ton 669.35 Ton 723.80 Ton 1022.25 Ton 950.8 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 851.45 Ton 851.45 Ton 923.45 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$118.68 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495
217 222 223 224 225 226 227 228 229 230 231 232 233 234	\$/16-7/15 See 3 \$/16-7/15 See 3 \$/17-7/15 See 3 \$/17-7/15 See 3 \$/17-7/15 See 6 \$/17/7/15 See 6	8752 Crane metats for NSG valve access (\$716-66-10) 8752 Crane metats for NSG valve access (\$716-66-10) 8752 Crane metats for NSG valve access 8766 Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Remout, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill Sand	1 invoice 1 invoice 4 Mrs 150.94 Ton 669.25 Ton 723.80 Ton 10222.5 Ton 950.8 Ton 1176.8 Ton 685.75 Ton 623.15 Ton 623.15 Ton 952.45 Ton 1524.55 Ton 1524.55 Ton 1524.55 Ton 1524.55 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$110.00 \$ \$110.00 \$ \$13.60 \$ \$13.50 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 15,525
217 222 223 224 225 226 227 228 229 230 231 232 233 244 235	\$/16-7/15 Sec 3 \$/16-7/15 Sec 3 \$/2/2/16 Sec 6 \$/2/2/16 Sec 6 \$/2/2/26 Sec 6 \$/2/2/16 Sec 6 \$/2/2/16 Sec 6 \$/2/2/26 Sec 6 \$/2/26 Sec 6 \$/26 Sec	8732. Crain enatis for Y5G valve access (\$/16.6/30) 8732. Crain enatis for Y5G valve access (\$/16.6/30) 8736. Exervation backfill	Mett Delivery & 1. Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone French Backfill-Sand	1 invoice 1 invoice 4 Mr. 150-94 Ton 660-25 Ton 723-80 Ton 1922-25 Ton 990-8 Ton 660-25 Ton 990-8 Ton 660-25 Ton 950-8 Ton 650-55 Ton 650-55 Ton 651-45 Ton 1272-25 Ton 1272-25 Ton 1272-25 Ton 1472-25 Ton 4650-70 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$110.00 \$ \$118.68 \$ \$113.00 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 15,825 6,708
217 222 223 224 225 226 227 229 230 231 232 233 234 235 236	\$716-7715 See 3 \$716-7715 See 3 \$717-7715 See 3 \$717-7715 See 3 \$717-7715 See 6	8752 Crane matts for NGG valve access (S/16-6/10) 8752 Crane matts for NGG valve access (S/16-6/10) 8752 Crane matts for NGG valve access 8766 Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 721.80 Ton 1721.80 Ton 1721.80 Ton 1776.8 Ton 485.75 Ton 623.15 Ton 623.15 Ton 851.45 Ton 1772.3 Ton 485.75 Ton 851.45 Ton 1772.3 Ton 485.9 Ton 1772.3 Ton 485.9 Ton 1772.17 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$13.50 \$ \$13.	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 15,825 6,708 3,768
217 222 223 224 225 226 227 228 230 231 232 233 234 235 236 237	\$\frac{1}{2}\frac{1}\frac{1}{2}\f	8732. Crain enatis for NSG valve access (\$/16.6/30) 8732. Crain enatis for NSG valve access (\$/16.6/30) 8736. Execution backfill	Mett Delivery & 1. Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone French Backfill Sand	1 Invoice 1 Invoice A MY. 150-94 Ton 660-25 Ton 723-80 Ton 723-80 Ton 1902-25 Ton 950-8 Ton 1176-8 Ton 683-75 Ton 683-75 Ton 683-15 Ton 923-55 Ton 1172-35 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$13,505 \$ \$18.68 \$ \$13,50 \$ \$1,50 \$ \$13,50 \$ \$1,50 \$ \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 15,825 6,708 3,768 3,768 285
217 222 223 224 225 226 227 228 229 230 231 231 232 233 233 233 234 235 236 237 245	\$716-7715 See 3 \$716-7715 See 3 \$7170-7715 See 3 \$7170-7716 See 6 \$71770-16 See 6	8732 Crane matts for K164 walve access (\$116.64.00) 8732 Crane matts for K164 valve access (\$116.64.00) 8736 Exervition backfill	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ten 669.25 Ten 723.80 Ten 1723.80 Ten 1723.80 Ten 1724.85 Ten 950.8 Ten 1176.9 Ten 623.15 Ten 623.15 Ten 623.15 Ten 851.45 Ten 456.27 Ten 1172.25 Ten 1	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$1	49,676 13,406 233,881 440 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 15,825 6,708 3,768 285
217 222 223 224 225 226 227 228 230 231 232 233 234 235 236 237	\$/16-7/15 See 3 \$/16-7/15 See 3 \$/17-7/15 See 3 \$/17-7/15 See 3 \$/17-7/15 See 6 \$/17/2016 See 6	8732 Crane metats for NGG valve access (\$716-66-70) 8752 Crane metats for NGG valve access (\$716-66-70) 8752 Crane metats for NGG valve access (\$716-66-70) 8756 Exervation backfill	Mart Delivery & 1 Month Rental (Midwest Access) Mart Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill-Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 1022.25 Ton 1022.25 Ton 950.8 Ton 1176.8 Ton 645.25 Ton 623.15 Ton 623.15 Ton 623.15 Ton 923.45 Ton 1177.25 Ton 117	\$49,676.45 \$ \$13,405.69 \$ \$110.00 \$ \$100.00 \$	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 6,588 8,413 7,135 11,495 12,548 15,825 6,708 3,768 285 7177
217 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 246	\$716-7715 See 3 \$716-7715 See 3 \$7170-7715 See 3 \$7170-7716 See 6 \$71770-16 See 6	8732 Crane matts for K164 with access (\$1/6.6/40) 8732 Crane matts for K164 with access (\$1/6.6/40) 8732 Crane matts for K164 with access 8736 Exervation backfill	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ten 669.25 Ten 723.80 Ten 1723.80 Ten 1723.80 Ten 1724.85 Ten 950.8 Ten 1176.9 Ten 623.15 Ten 623.15 Ten 623.15 Ten 851.45 Ten 456.27 Ten 1172.25 Ten 1	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$1	49,676 13,406 233,881 440 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 15,825 6,708 3,768 285 717
217 222 223 224 225 226 227 228 229 231 231 232 234 235 236 237 245	\$7.54 - 77.15 Sec 3 \$7.76 - 77.15 Sec 3 \$7.72 - 77.15 Sec 5 \$7.72 - 77.15 Sec 6 \$7.72	8732 Crane metats for NGG valve access (\$716-66-70) 8752 Crane metats for NGG valve access (\$716-66-70) 8752 Crane metats for NGG valve access (\$716-66-70) 8756 Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 Invoice 1 Invoice 4 Nrs 150.94 Ton 669.35 Ton 723.80 Ton 90.8 Ton 90.8 Ton 455.75 Ton 623.15 Ton 623.15 Ton 623.15 Ton 851.45 Ton 851.45 Ton 1172.35 Ton	\$49,676.45 \$ \$13,405.69 \$ \$11,000 \$ \$110.00 \$ \$100.00 \$	49,676 13,406 233,881 440 480 9,035 9,771 13,800 12,836 15,887 1,135 11,495 12,548 15,825 6,708 3,708 285 717 1,815 1,815
217 222 223 224 225 226 227 228 230 231 231 232 233 234 235 236 237 245 245 246 247 250	\$/16-7/15 See 3 \$/16-7/15 See 3 \$/17-7/15 See 3 \$/17-7/15 See 3 \$/17-7/15 See 6 \$/17/7016 See 6	8732 Crane matts for NGG valve access (S/16-6/10) 8752 Crane matts for NGG valve access (S/16-6/10) 8752 Crane matts for NGG valve access 8766 Exervation backfill	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Sie-Wheel Dump 3° Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.35 Ton 723.80 Ton 723.80 Ton 102225 Ton 550.3 Ton 1176.3 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 127.25 Ton 851.45 Ton 127.25 Ton 486.9 Ton 127.25 Ton 486.9 Ton 130.5 Ton 38.89 Ton 16.5 Hrs 0.5 Hrs 0.5 Hrs	\$49,676.45 \$ \$13,405.60 \$ Total \$ \$110.00 \$ \$100.00 \$ \$1	49,676 13,406 233,881 440,0 440 2,820 9,035 9,771 13,800 12,836 8,413 7,135 12,548 15,825 6,708 3,768 2,855 717 1,815
217 222 223 224 225 226 227 228 229 230 230 231 232 233 244 255 265 27 285 297 265 27 27 285 297 297 297 297 297 297 297 297 297 297	\$716-7715 See 3 \$716-7715 See 3 \$717-7715 See 3 \$717-7715 See 3 \$717-7715 See 5 \$717-7715 See 6	8752. Craine mattisfs for KIGs valve access (S/16-6/10) 8752. Craine mattisfs for KIGs valve access (S/16-6/10) 8752. Craine mattisfs for KIGs valve access 8766. Exercision backfill	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3" Stone Trench Backfill Sand	1 Invoice 1 Invoice 4 Nrs 150.94 Ton 669.25 Ton 721.80 Ton 1022.25 Ton 950.8 Ton 1176.8 Ton 623.15 Ton 623.15 Ton 631.15 Ton 531.55 Ton 851.45 Ton 1172.25 Ton 1172.25 Ton 1172.8 Ton 323.87 Ton 1172.37 Ton 34.87 Ton 35.87 Ton 36.87 Ton 36.87 Ton 36.97 Ton 36.97 Ton 36.97 Ton 36.97 Ton 36.97 Ton 36.97 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$115.00 \$ \$11	49,676 13,406 233,881 440 233,881 440 9,035 9,771 13,800 12,836 8,413 7,135 11,495 12,548 15,827 6,708 3,768 285 777 7,17 1,815 15 2,640 2,163
217 222 223 224 225 226 227 228 229 230 231 242 245 245 245 246 247 250 253	\$7.16 - 77.15 Sec 3 \$7.16 - 77.15 Sec 3 \$7.16 - 77.15 Sec 3 \$7.10 Sec 6 \$7.77.216 Sec 6 \$7.77.	8732. Crain enatis for NSG valve access (\$/16-6/40) 8732. Crain enatis for NSG valve access (\$/16-6/40) 8732. Crain enatis for NSG valve access 8736. Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone 1'rench Backfill-Sand 1'rench Backfill-	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 723.80 Ton 107.22 Ton 950.8 Ton 1176.8 Ton 485.75 Ton 623.15 Ton 623.15 Ton 623.15 Ton 485.75 Ton 735.85 Ton 1172.25 Ton 485.9 Ton 1172.25 Ton 485.9 Ton 1172.25 Ton 485.9 Ton 1172.25 Ton	\$49,676.45 \$ \$13,405.60 \$ Total \$ \$110.00 \$ \$100.00 \$ \$110.00 \$ \$100.00 \$ \$1	49,676 13,406 233,881 2,320 9,035 9,035 12,836 12,836 15,837 15,877 15,578 11,495 12,548 3,768 3,768 2855 717 1,815 15 2,640 2,163
217 222 223 224 225 226 227 228 229 230 231 231 232 233 234 235 236 237 245 250 253 253 254	\$716-7715 See 3 \$716-7715 See 3 \$717-7715 See 3 \$717-7715 See 3 \$717-7715 See 5 \$717-7715 See 6	8722 Crane mattis for NSG valve access (\$/166/30) 8722 Crane mattis for NSG valve access (\$/166/30) 8723 Crane mattis for NSG valve access 8726 Exervation backfill	Matt Delivery & 1. Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Sie Wheel Dump 3° Store Trench Backfill Sand Trench Backfill San	1 Invoice 1 Invoice 4 Nrs. 150.94 Ton 669.25 Ton 723.80 Ton 1022.25 Ton 990.8 Ton 1176.8 Ton 648.5 Ton 648.5 Ton 653.45 Ton 653.45 Ton 653.45 Ton 1172.25 Ton 1172.25 Ton 1172.15 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$100.00 \$ \$1	49,676 13,406 233,881 440 2,820 9,035 9,771 13,800 12,836 15,887 6,558 8,413 7,135 11,495 12,548 285 285 285 215 15,825 26,640 2,163 5,889 600
217 222 223 224 225 226 227 231 231 231 232 233 234 234 235 236 237 245 246 247 250 250 251	\$716-7715 See 3 \$716-7715 See 3 \$7176-7715 See 3 \$717016 See 6	8732. Crane mattis for K164 valve access (\$716.64.00) 8732. Crane mattis for K164 valve access (\$716.64.00) 8736. Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 invoice 1 invoice 4 Hrs 150.94 Ten 669.25 Ten 723.80 Ten 1723.80 Ten 1723.80 Ten 1724.80 Ten 1725.70 Ten 950.8 Ten 1176.9 Ten 623.15 Ten 623.15 Ten 623.15 Ten 623.15 Ten 623.15 Ten 172.25 Ten 17	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$118.00 \$ \$118.00 \$ \$118.00 \$ \$118.00 \$ \$119.00 \$ \$1	49,676 13,406 233,881 233,881 240 2,820 9,035 9,717 13,800 12,836 8,413 7,135 6,708 285 717 15,548 15,825 6,708 285 717 2,640 2,640 2,163 589
217 222 223 224 225 226 227 228 229 230 231 231 232 232 233 243 245 246 247 245 246 247 257 245 245 246 247 257 245 256 257	\$\frac{1}{3}\frac{1}{2}\frac{1}\frac{1}{2}\f	8732. Crain enatists for NGG valve access (\$/16.6/30) 8732. Crain enatists for NGG valve access (\$/16.6/30) 8736. Exervation backfill 87376. Exervation backfill	Matt Delivery & 1. Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone 1'rench Backfill-Sand 1'rench Backfill	1 invoice 1 invoice 1 invoice 4 Mr. 150.94 Ton 660.25 Ton 723.80 Ton 723.80 Ton 1022.25 Ton 950.8 Ton 950.8 Ton 663.25 Ton 651.45 Ton 651.45 Ton 651.45 Ton 1172.25 Ton	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$100.00 \$ \$1	49,676 13,406 233,881 2480 2,820 2,820 9,035 9,771 13,800 15,887 6,558 8,413 7,135 11,495 225 285 285 285 285 285 285 285 285 28
217 222 223 224 225 226 227 228 229 231 231 234 235 246 257 266 267 261	\$7.16 - 77.15 See 3 \$7.16 - 77.15 See 3 \$7.16 - 77.15 See 3 \$7.17.2016 See 6	8732. Craine mattis for KSG valve access (\$716-66-10) 8732. Craine mattis for KSG valve access (\$716-66-10) 8736. Exervation bacdiff 8736. Exervat	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand	1 Invoice 1 Invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 1202.25 Ton 950.8 Ton 1202.25 Ton 950.8 Ton 485.75 Ton 623.15 Ton 633.15 Ton 633.15 Ton 1172.25 Ton 1172.25 Ton 1172.25 Ton 1172.25 Ton 130.57 Ton 130.57 Ton 130.57 Ton 130.57 Ton 130.57 Ton 140.55 Hrs 15 Hrs 15 Hrs 15 Hrs 16 Hrs 16 Hrs 17 Ton 180.57 Ton	\$49,676.45 \$ \$13,405.60 \$ Total \$ \$110.00 \$ \$110.00 \$ \$110.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$115.00 \$ \$	49,676 13,406 233,881 440 2,820 23,881 9,771 13,800 12,836 15,887 7,135 12,548 3,768 3,768 285 717 13,100 15,2640 1,1815 15,2640 2,421 151
217 222 223 224 225 226 227 228 229 231 232 233 234 235 246 247 245 246 247 250 251 261 262	\$716-7715 See 3 \$716-7715 See 3 \$716-7715 See 3 \$717-7715 See 3 \$717-7715 See 5 \$717-7715 See 5 \$717-7715 See 6	8732. Craine mattis for KSG valve access (\$/16.6/40) 8732. Craine mattis for KSG valve access (\$/16.6/40) 8736. Exervation backfill 87376. Exervation backfill	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone 1'rench Backfill-Sand 1'rench Backfill-	1 invoice 1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 721.80 Ton 721.80 Ton 1072.25 Ton 950.8 Ton 1176.8 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 851.45 Ton 1172.35 Ton 485.0 Ton 1172.35 Ton 485.0 Ton 1172.37 Ton 130.5 Ton 130.5 Ton 34.89 Ton 131.5 Hrs 3.4 Hrs 115.79 Ton 39.44 Ton 39.44 Ton 5 Hrs 115.79 Ton 39.44 Ton 5 Hrs 115.79 Ton 39.44 Ton 5 Hrs 112.61 Ton 8.06 Ton 1 Hrs 1.165 Ton 8.06 Ton 1 Hrs	\$49,676.45 \$ \$13,405.60 \$ \$110.00 \$	49,676.76 13,666 13,666 13,666 13,666 13,666 13,666 13,666 13,666 13,666 14,666 14,666 14,666 14,666 14,666 14,666 14,666 14,6666 14,6666 14,6666 14,6666 14,6666 14,66666 14,666666 14,666666666 14,6666666666
217 222 223 224 225 226 227 228 229 231 231 233 244 255 266 247 250 251 252 253 256 257 266 266	\$7.5 - 77.5 Sec 3 \$7.7 - 77.5	8732. Crain enatists for NGG valve access (\$716-66-80) 8736. Crain enatists for NGG valve access (\$716-66-80) 8736. Exercation backfill	Matt Delivery & 1 Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Sie-Wheel Dump 3° Stone 1° Trench Backfill Sand 1° Stone 10.06.06 Stone 3° Stone 1.06.06 Stone 3° Stone 1.06.06 Stone 2° Stone 1.06.06 Stone 5° Stone 1.06.06 Stone 5° Stone 1.07.06 Stone 5° Stone 1.07.06.06 Stone 5° Stone 1.08.07.07 Backfill Stone 1° Stone 1.08.07 Backfill Stone 1° Stone 1.08.07 Backfill Stone 1° Stone 1.08.08 Stone 1° Stone 1.08.08 Stone 1° Stone 1.08.08 Stone 1.08.08 Stone 1.08.08 Stone 1.08.08 Stone 1.09.08 Stone 1.09	1 Invoice 1 Invoice 4 Nrs 150.94 Ton 669.35 Ton 723.80 Ton 723.80 Ton 950.8 Ton 669.35 Ton 669.35 Ton 623.15 Ton 851.45 Ton 1172.25 Ton 1172.25 Ton 1172.35 Ton 38.39 Ton 16.5 Nrs 24 Nrs 24 Nrs 24 Nrs 24 Nrs 24 Nrs 25 Nrs 26 Nrs 26 Nrs 27 Nrs 28 Nrs 28 Nrs 28 Nrs 29 Nrs 29 Nrs 20 Nrs 30	\$49,676.45 \$ \$13,405.60 \$ Total \$ \$110.00 \$ \$10.00 \$	\$9,076.70 233,8818 440 49,202 9,777.71 13,800 15,777.71 13,800 15,777.71 13,800 15,777.71 13,800 15,878.71 11,258.81
217 222 223 224 225 226 227 228 230 231 242 232 230 231 242 235 246 247 250 253 251 261 262 263 263	\$716-7715 See 3 \$716-7715 See 3 \$7176-7715 See 3 \$717016 See 6 \$7177016 See 6	8732. Crane matts for NSG valve access (\$716-66-10) 8752. Crane matts for NSG valve access (\$716-66-10) 8752. Crane matts for NSG valve access (\$716-66-10) 8756. Exervation backfill 87576. Exervation	Matt Delivery & 1 Month Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone 1'rench Backfill-Sand 1'rench Backfill-	1 invoice 1 invoice 4 Hrs 150.94 Ten 669.25 Ten 721.80 Ten 721.80 Ten 107.22 Ten 950.8 Ten 1176.8 Ten 485.75 Ten 623.15 Ten 623.15 Ten 623.15 Ten 833.45 Ten 1172.25 Ten 466.3 Ten 1172.25 Ten 466.3 Ten 1172.25 Ten 1172.2	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$18.68 \$ \$115.00 \$ \$11	49,076,72 283,8818 440 283,8818 440 480 480 480 480 480 480 480 480 48
217 222 223 224 225 226 227 228 229 230 231 232 232 232 232 233 243 255 266 267 276 262 263 264 264 266 270 271	\$716-7715 Sec 3 \$716-7715 Sec 3 \$716-7715 Sec 3 \$727016 Sec 6 \$727216 Se	8732. Craine mattis for NSG valve access (\$716-66-09) 8732. Craine mattis for NSG valve access (\$716-66-09) 8736. Exervation backfill 8736. Exervati	Matt Delivery & 1. Moeth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Sie-Wheel Dump 3° Stone Trench Backfill Sand Trench Backfill San	1 Invoice 1 Invoice 4 Nrs 150.94 Ton 669.25 Ton 721.80 Ton 1202.25 Ton 990.8 Ton 1202.25 Ton 990.8 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 633.15 Ton 1172.25 Ton 1203.7 Ton 1203.7 Ton 130.7 Ton 130.7 Ton 130.7 Ton 130.7 Ton 140.5 Nrs 0.5 Nrs 0.5 Nrs 120.8 Ton 130.7 To	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$110.00 \$ \$110.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$116.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$115.00 \$ \$116.00 \$ \$1	49,076.74 233,681.81 243,681.81 240.02 243,681.81 240.02 243,681.81 240.02 243,681.81 240.02 243,681.81 240.02 243,681.81 243,682.81
217 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 247 247 247 247 259 250 250 253 261 262 262 263 264 269 270 271 272 273	\$716-7715 See 3 \$716-7715 See 3 \$716-7715 See 3 \$717-7715 See 3 \$717-7715 See 3 \$717-7715 See 5 \$717-7715 See 6	8732 Crane matts for K164 valve access (\$15.66.40) 8732 Crane matts for K164 valve access (\$15.66.40) 8736 Exervation backfill 8737 Exervation backfill 8738 Water main repair 8738 Back Capping 8800 Capping 8800 Capping	Matt Delivery & 1 Moreth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand Trench Backfill San	1 invoice 1 invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 723.80 Ton 1022.25 Ton 950.8 Ton 1176.2 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 623.15 Ton 723.85 Ton 851.45 Ton 1172.25 Ton 1172.25 Ton 120.71 Ton 120.71 Ton 120.71 Ton 120.71 Ton 120.71 Ton 130.9 Ton 141.72 Ton 150.9 Ton 1	\$49,676.45 \$ \$13,405.60 \$ Total \$ \$110.00 \$ \$1	49,076,72 283,881 440 440,075,72 37,72 47,72 47,72 47,73 47,
217 222 223 224 225 226 227 228 229 231 232 233 234 235 246 247 256 267 260 277 262 260 270 277 277 277	\$716-7715 Sec 3 \$716-7715 Sec 3 \$716-7715 Sec 3 \$727016 Sec 6 \$727216 Se	8732. Crane mattis for YSG valve access (\$716-66-80) 8732. Crane mattis for YSG valve access (\$716-66-80) 8736. Exervation backfill 8737. Water main repair 8735. Water main repair 8735. Water main repair 8735. Water main repair 8736. Exervation Backfill 8736. Exervation backfill 8737. Exervation backfill 8738. Exervation backfill 8739. Exervation backfil	Matt Delivery & 1. Moreth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Sie-Wheel Dump 3° Stone Trench Backfill Sand Trench Backfill Sa	1 Invoice 1 Invoice 1 Invoice 4 Nrs 150.94 Ton 660.25 Ton 723.80 Ton 723.80 Ton 102.25 Ton 950.8 Ton 1176.8 Ton 663.5 Ton 653.5 Ton 653.45 Ton 551.45 Ton 551.45 Ton 1172.25 Ton 920.47 Ton 1172.25 Ton 201.17 Ton 38.39 Ton 3.83 Ton 3.83 Ton 3.84 Ton 1150.5 Hrs 2.8 Hrs 3.8 Hrs 3.8 Hrs 115.7 Ton 304.1 Ton 305.1 Ton 306.0 Ton 6.05 Ton 1 Hrs 1.5 Hrs 5.5 Hrs 7.5 Hrs 150.80 Ton 2 Hrs 150.80 Ton 2 Hrs	\$49,676.45 \$ \$13,405.69 \$ Total \$ \$110.00 \$ \$1	49,076,076 233,881 84 440 440 233,881 84 440 440 243,881 84 440 440 440 243,881 84 440 440 243,881 84 244,881
217 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 245 246 246 247 247 259 250 253 261 262 263 264 266 267 277 261 262 263 264 266 267 277 261 262 263 264 266 267 277 277 277 277 277	\$716-7715 See 3 \$716-7715 See 3 \$716-7715 See 3 \$717-7715 See 3 \$717-7715 See 3 \$717-7715 See 5 \$717-7715 See 6	8732 Crane matts for K164 valve access (\$15.66.40) 8732 Crane matts for K164 valve access (\$15.66.40) 8736 Exervation backfill 8737 Exervation backfill 8738 Water main repair 8738 Back Capping 8800 Capping 8800 Capping	Matt Delivery & 1 Moreth Rental (Midwest Access) Matt Removal, 307 Matts (Midwest Access) Six-Wheel Dump 3° Stone Trench Backfill Sand Trench Backfill San	1 Invoice 1 Invoice 4 Hrs 150.94 Ton 669.25 Ton 723.80 Ton 723.80 Ton 99.0.8 Ton 190.25 Ton 99.0.8 Ton 1176.8 Ton 663.15 Ton 623.15 Ton 1172.25 Ton 110.50 Ton 10.50 Ton 10.50 Hrs 1	\$49,676.45 \$ \$13,405.60 \$ Total \$ \$110.00 \$ \$1	49,076,72 283,881 440 440,075,72 37,72 47,72 47,72 47,73 47,

AT&T	NSG		Utility/ACM Excavation	NICOR	Dewater	W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	H&S
	\$	219									
	\$	880									
	\$	880									
	\$	1,800									
	\$	990									
	\$	880									
	\$	880									
	\$	110									
								\$ 8,138			
				\$ 56							
				\$ 70							
				\$ 1,430							
				\$ 400							
				\$ 588							
				\$ 220							
				\$ 120							
								\$ 3,520			
								\$ 6,409			
				4 4 050				3 0,409			
				\$ 1,058							
				\$ 495							<u></u>
			1	\$ 720							
								\$ 5,666			
	1			1				\$ 1,004			
	+		l	-	l	l	l	\$ 880		l	
	+			-				\$ 600			
								\$ 492			
	1							\$ 1,920			
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								\$ 1,260			
								\$ 1,318			
								\$ 960			
								\$ 1,550			
								\$ 390			
								\$ 1,513			
		15,525									
	\$	7,041									
	\$	11,739									
	\$	2,808									
	\$	1,334									
	\$	1,036									
		49,676									
		13,406									
\$ -		62,678		\$ 5,156	\$ 24,325		\$ -	\$ 41,721		\$ -	\$ -
5 -	5	02,078		5 5,156	\$ 24,325	\$ -	\$ -	\$ 41,721	\$ -	\$ -	-
								\$ 440			
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								\$ 2,820			
								\$ 9,035			
								\$ 9,035			
								\$ 9,035			
								\$ 9,035 \$ 9,771 \$ 13,800			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 8,413			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 8,413 \$ 7,135			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 8,413 \$ 7,135 \$ 11,495			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 8,413 \$ 7,135			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 8,413 \$ 7,135 \$ 11,495			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 7,135 \$ 71,135 \$ 11,495 \$ 12,548 \$ 15,825			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 7,135 \$ 11,495 \$ 11,5825 \$ 15,825 \$ 6,708			
								\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,887 \$ 6,558 \$ 8,413 \$ 7,135 \$ 11,495 \$ 12,548 \$ 15,825 \$ 6,708			
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						\$ 110		\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,837 \$ 6,558 \$ 6,558 \$ 8,413 \$ 11,895 \$ 11,548 \$ 11,548 \$ 11,548 \$ 12,548 \$ 5 7,135 \$ 12,548 \$ 7,737 \$ 12,548 \$ 5 7,737 \$ 12,548 \$ 5 7,737 \$ 13,737 \$ 13,7		\$ 15	
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						\$ 110 \$ 1,650		\$ 9,035 \$ 9,771 \$ 13,800 \$ 12,836 \$ 15,837 \$ 6,558 \$ 6,558 \$ 8,413 \$ 11,895 \$ 11,548 \$ 11,548 \$ 11,548 \$ 12,548 \$ 5 7,135 \$ 12,548 \$ 7,737 \$ 12,548 \$ 5 7,737 \$ 12,548 \$ 5 7,737 \$ 13,737 \$ 13,7		\$ 15	
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						\$ 110 \$ 1,650		\$ 9,035 \$ 9,771 \$ 13,806 \$ 12,836 \$ 12,836 \$ 12,836 \$ 12,836 \$ 15,827 \$ 6,738 \$ 11,495 \$ 11,495 \$ 15,825 \$ 17,135 \$ 17,135		\$ 15	
						\$ 110 \$ 1,650		\$ 9,015 13,800 5 9,717 5 13,807 5 13,807 5 13,807 5 6,538 5 8,413 5 7,135 5 6,708 5 12,548 5 12,548 5 12,548 5 12,548 5 12,548 5 12,548 5 12,548 5 285 5 7,77 7 7 7 7 7 7 7 7		\$ 15	
						\$ 110 \$ 1,650		\$ 9,035 5 9,771 5 13,806 5 12,836 5		\$ 15	
						\$ 110 \$ 1,650		\$ 9,015 13,800 5 9,717 5 13,807 5 13,807 5 13,807 5 6,538 5 8,413 5 7,135 5 6,708 5 12,548 5 12,548 5 12,548 5 12,548 5 12,548 5 12,548 5 12,548 5 285 5 7,77 7 7 7 7 7 7 7 7		\$ 15	

Table 3
Costs incurred during Site 3 & Site 6 Remediation Work
Campanella & Sons Time and Materials Invoices

May 11, 2017	•					
Line#	Date Site	Invoice# Scope of Work	Description	Quantity Unit	Unit Cost Total	Cost
276	9/14/2016 Site 6	8800 Capping	CM-06 Stone	19.72 Ton	\$14.95 \$	295
289	9/22/2016 Site 6	8800 Remove temporary fence	Cat 938G Loader	1.5 Hrs	\$ 200.00 \$	300
290	9/22/2016 Site 6	8800 Remove temporary fence	Laborer	5 Hrs	\$ 110.00 \$	550
291	9/23/2016 Site 6	8800 Remove fence and relocate concrete blocks	Cat 938G Loader	7 Hrs	\$ 200.00 \$	1,400
292	9/23/2016 Site 6 9/26/2016 Site 6	8800 Remove fence and relocate concrete blocks 8800 Remove fence	Laborer	11 Hrs 8 Hrs	\$110.00 \$ \$110.00 \$	1,210
294 321	9/26/2016 Site 6 10/24/2016 Site 6	8800 Remove tence 8846 Preparing for southern boundary excavation	Excavator at JM (Cat 315)	8 Hrs 8.5 hrs	\$ 110.00 \$ \$ 225.00 \$	1.913
322	10/24/2016 Site 6	8846 Dismantling southern fence	Laborer	8.5 HS	\$ 110.00 \$	1,760
323	10/25/2016 Site 6	8846 Southern boundary excavation	Excavator at JM (Cat 315)	11.5 hrs	\$ 225.00 \$	2,588
324	10/25/2016 Site 6	8846 Southern boundary excavation	Six-Wheeler at JM	22.5 hrs	\$110.00 \$	2,475
325	10/25/2016 Site 6	8846 Southern boundary excavation	Water Truck	11.5 hrs	\$ 180.00 \$	2,070
326	10/25/2016 Site 6	8846 Southern boundary excavation	Laborer	32 hrs	\$110.00 \$	3,520
327	10/25/2016 Site 6	8846 Southern boundary excavation	Loader at JM (Cat 938)	8 hrs	\$ 235.00 \$	1,880
328 329	10/27/2016 Site 6 10/27/2016 Site 6	8846 Southern boundary excavation 8846 Southern boundary excavation	Excavator at JM (Cat 330) Excavator at JM (Cat 315)	8.5 hrs 11.5 hrs	\$ 240.00 \$ \$ 225.00 \$	2,040
329	10/27/2016 Site 6	8846 Southern boundary excavation	Excavator at JM (Cat 315) Loader at JM (Cat 938)	11.5 nrs	\$ 225.00 \$ \$ 235.00 \$	2,588
331	10/27/2016 Site 6	8846 Relocating temporary fence & excavation	Skidsteer at JM (TR 320)	11 hrs	\$ 195.00 \$	2.145
332	10/27/2016 Site 6	8846 Southern boundary excavation	Six-Wheeler at JM	22 hrs	\$ 110.00 \$	2,420
333	10/27/2016 Site 6	8846 Relocating temporary fence & excavation	Laborer	72.5 hrs	\$ 110.00 \$	7,975
334	10/28/2016 Site 6	8846 Southern boundary excavation	Excavator at JM (Cat 315)	8.5 hrs	\$ 225.00 \$	1,913
335	10/28/2016 Site 6	8846 Southern boundary excavation	Loader at JM (Cat 938)	8 hrs	\$ 235.00 \$	1,880
336	10/28/2016 Site 6	8846 Southern boundary excavation	Skidsteer at JM (TR 320)	8 hrs	\$ 195.00 \$	1,560
337	10/28/2016 Site 6	8846 Southern boundary excavation	Six-Wheeler at JM	17 hrs	\$ 110.00 \$	1,870
338 339	10/28/2016 Site 6 10/31/2016 Site 6	8846 Southern boundary excavation 8846 Backfilled southern boundary excavation	Laborer Skidsteer at JM (TR 320)	24 hrs 8 hrs	\$ 110.00 \$ \$ 195.00 \$	2,640 1,560
339	10/31/2016 Site 6 10/31/2016 Site 6	8846 Backfilled southern boundary excavation 8846 Backfilled southern boundary excavation	Skidsteer at JM (TR 320) Trench Backfill-Sand	8 hrs 468.5 ton	\$ 195.00 \$ \$ 14.32 \$	6,709
340	10/31/2016 Site 6	8846 Removing southern foundary excavation 8846 Removing southern fence & excavation backfill	Laborer	468.5 ton 8 hrs	\$ 14.32 \$ \$ 110.00 \$	880
342	11/1/2016 Site 6	8846 Removing southern fence & installing temporary fence	Laborer	40 hrs	\$ 110.00 S	4.400
343	11/2/2016 Site 6	8846 Removing southern fence & installing temporary fence	Laborer	24 hrs	\$ 110.00 \$	2,640
344	11/3/2016 Site 6	8846 Dewatered southern boundary excavation	Laborer	8 hrs	\$ 110.00 \$	880
345	11/4/2016 Site 6	8846 Backfilled southern boundary excavation	Skidsteer at JM (TR 320)	8 hrs	\$ 195.00 \$	1,560
346	11/4/2016 Site 6	8846 Backfilled southern boundary excavation	Trench Backfill-Sand	137.85 ton	\$ 14.32 \$	1,974
347	11/4/2016 Site 6	8846 Backfilled southern boundary excavation, fence work	Laborer	24 hrs	\$ 110.00 \$	2,640
348	11/7/2016 Site 6	8846 Backfilled southern boundary excavation	Skidsteer at JM (TR 320)	9 hrs	\$ 195.00 \$	1,755
349 350	11/7/2016 Site 6 11/7/2016 Site 6	8846 Backfilled southern boundary excavation 8846 Backfilled southern boundary excavation, fence work	Trench Backfill-Sand Laborer	339.35 ton 24 hrs	\$ 14.32 \$ \$ 110.00 \$	4,859 2,640
351	11/8/2016 Site 6	8846 Southern boundary excavation	Loader at JM (Cat 938)	24 IIIS 8 hrs	\$ 235.00 S	1,880
352	11/8/2016 Site 6	8846 Southern boundary excavation	Laborer	8 hrs	\$ 110.00 \$	880
353	11/9/2016 Site 6	8846 Backfilled southern boundary excavation	Loader at JM (Cat 938)	9.5 hrs	\$ 235.00 \$	2,233
354	11/9/2016 Site 6	8846 Backfilled southern boundary excavation	Laborer	8 hrs	\$ 110.00 \$	880
355	11/10/2016 Site 6	8846 Fence relocation work, staked Black Ditch	Laborer	32 hrs	\$ 110.00 \$	3,520
358	11/14/2016 Site 6	8846 Fence relocation work	Laborer	24 hrs	\$110.00 \$	2,640
359	11/15/2016 Site 6	8846 Capping Site 6	Skidsteer at JM (Case 70XT)	8 hrs	\$ 195.00 \$	1,560
360 361	11/15/2016 Site 6 11/15/2016 Site 6	8846 Capping Site 6 8846 Fence relocation work	Topsoil Laborer	12 lds 24 hrs	\$ 65.00 \$ \$ 110.00 \$	780 2.640
362	11/15/2016 Site 6	8846 Capping Site 6	Skidsteer at JM (Case 70XT)	24 nrs 8 hrs	\$ 195.00 \$	1,560
364	11/16/2016 Site 6	8846 Capping Site 6	Laborer	8 hrs	\$ 110.00 \$	880
368	11/17/2016 Site 6	8846 Capping Site 6	Skidsteer at JM (TR 320)	8 hrs	\$ 195.00 \$	1,560
369	11/17/2016 Site 6	8846 Capping Site 6	Skidsteer at JM (Case 450CT)	8 hrs	\$ 195.00 \$	1,560
377	12/8/2016 Site 6	8846 Double Arrow Sign in Site 6 (installed 12/5)	Arrow Sign - WZS	1 EA	\$ 682.00 \$	682
379	12/8/2016 Site 6	8846 Capping Site 6 (11/23)	IDOT Mix Surcharge for Site 6	2.5 acres	\$ 500.00 \$	1,250
					Total \$	263,835
1	5/6/2015 Sites 3 & 6	8523 Utility pole installation to reroute AT&T cables	Cat 320 Excavator	8.5 hrs	\$ 250.00 \$	2,125
2	5/6/2015 Sites 3 & 6	8523 Utility pole installation to reroute AT&T cables	Semi Dump Trailer	6 hrs	\$ 125.00 \$	750
3	5/6/2015 Sites 3 & 6	8523 Utility pole installation to reroute AT&T cables	Laborer Foreman	8.5 hrs	\$ 105.00 \$	893
5	5/7/2015 Sites 3 & 6 5/7/2015 Sites 3 & 6	8523 Utility pole installation to reroute AT&T cables 8523 Utility pole installation to reroute AT&T cables	Cat 320 Excavator Semi Dump Trailer	8.5 hrs 5.5 hrs	\$ 250.00 \$ \$ 125.00 \$	2,125 688
6	5/7/2015 Sites 3 & 6 5/7/2015 Sites 3 & 6	8523 Utility pole installation to reroute AT&T cables 8523 Utility pole installation to reroute AT&T cables	Semi Dump Trailer Laborer Foreman	5.5 hrs 8.5 hrs	\$ 125.00 \$ \$ 105.00 \$	688 893
7	5/7/2015 Sites 3 & 6	8523 Utility pole installation to reroute AT&T cables	Utility Pole Installation (Home Towne Electric Sub.)	1 invoice	\$ 12,128.00 \$	12,128
29	8/29/2015 Sites 3 & 6	8592 Deliver & stage barrier wall for AT&T	Cat 315CL Excavator	6 hrs	\$ 250.00 \$	1,500
30	8/29/2015 Sites 3 & 6	8592 Deliver & stage barrier wall for AT&T	JD 744H Loader	8 hrs	\$ 220.00 \$	1,760
31	8/29/2015 Sites 3 & 6	8592 Deliver & stage barrier wall for AT&T	Semi Flat Bed	12.5 hrs	\$ 125.00 \$	1,563
32	8/29/2015 Sites 3 & 6	8592 Deliver & stage barrier wall for AT&T	Laborer	8 hrs	\$ 105.00 \$	840
33	8/31/2015 Sites 3 & 6	8592 Excavate access holes on Greenwood Ave for AT&T	Komatsu PC490LC Excavator	3 hrs	\$ 250.00 \$	750
34	8/31/2015 Sites 3 & 6	8592 Excavate access holes on Greenwood Ave for AT&T	JD 744H Loader	3 hrs	\$ 220.00 \$	660
35 36	8/31/2015 Sites 3 & 6 8/31/2015 Sites 3 & 6	8592 Excavate access holes on Greenwood Ave for AT&T 8592 Excavate access holes on Greenwood Ave for AT&T	Cat 315CL Excavator	3 hrs 6 hrs	\$ 250.00 \$ \$ 105.00 \$	750 630
36	8/31/2015 Sites 3 & 6 8/31/2015 Sites 3 & 6	8592 Excavate access holes on Greenwood Ave for AT&T 8592 Excavate access holes on Greenwood Ave for AT&T	Laborer Six Wheeler Dump	6 hrs 8 hrs	\$ 105.00 \$ \$ 110.00 \$	630 880
38	9/3/2015 Sites 3 & 6	8616 Excavate access holes on Greenwood Ave for AT&T	Cat 315CL Excavator	8.5 hrs	\$ 250.00 S	2.125
39	9/3/2015 Sites 3 & 6	8616 Excavate access holes on Greenwood Ave for AT&T	Laborer	6 hrs	\$ 105.00 \$	630
40	9/3/2015 Sites 3 & 6	8616 Excavate access holes on Greenwood Ave for AT&T	Six Wheel dump	9.5 hrs	\$ 110.00 \$	1,045
41	10/19/2015 Sites 3 & 6	8643 Place barrier wall for AT&T	Cat IT 38G Loader	4 hrs	\$ 200.00 \$	800
42	11/13/2015 Sites 3 & 6	8643 Place barrier wall for AT&T	Cat 320C Backhoe	5 hrs	\$ 235.00 \$	1,175
43	11/13/2015 Sites 3 & 6	8643 Place barrier wall for AT&T	Operator Overtime	1 hrs	\$ 36.60 \$	37
44	11/13/2015 Sites 3 & 6	8643 Place barrier wall for AT&T	Cat 740 Off Road Truck	3 hrs	\$ 245.00 \$	735
45	11/13/2015 Sites 3 & 6	8643 Place barrier wall for AT&T	Laborer	8 hrs	\$ 105.00 \$	840
46 47	12/4/2015 Sites 3 & 6	8643 Build berm to dewater at Greenwood Ave. for AT&T	JD 744H Loader	8 hrs	\$ 220.00 \$	1,760
	12/4/2015 Sites 3 & 6	8643 Build berm to dewater at Greenwood Ave. for AT&T	Laborer Foreman	8 hrs	\$ 105.00 \$	840

AT&T	NSG	Utility/ACM	NICOR	Dewater	W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	H&S
		Excavation					\$ 295			
									\$ 300	
									\$ 550	
									\$ 1,400	
									\$ 1,210	
									\$ 880	
					\$ 1,913					
									\$ 1,760	
					\$ 2,588					
					\$ 2,475					
					\$ 2,070					
					\$ 3,520 \$ 1,880					
					\$ 1,880					
					\$ 2,588					
					\$ 235					
									\$ 2,145	
					\$ 2,420					
									\$ 7,975	
					\$ 1,913					
					\$ 1,880					
					\$ 1,560					
					\$ 1,870					
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-					- 800		\$ 1,560			
							\$ 1,974			
							\$ 2,640			
							\$ 1,755			
							\$ 4,859			
							\$ 2,640			
					\$ 1,880					
					\$ 880					
							\$ 2,233			
							\$ 880			
									\$ 3,520	
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\$ 37										
\$ 735										
\$ 840										
\$ 1,760 \$ 840										
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Table 3
Costs incurred during Site 3 & Site 6 Remediation Work
Campanella & Sons Time and Materials Invoices

May 11, 2017					
Line#	Date Site	Invoice# Scope of Work	Description	Quantity Unit	Unit Cost Total Cost
48	12/4/2015 Sites 3 & 6 12/4/2015 Sites 3 & 6	8643 Build berm to dewater at Greenwood Ave. for AT&T 8643 Build berm to dewater at Greenwood Ave. for AT&T	6-Wheel Dump	16 hrs	\$ 110.00 \$ 1,760 \$ 12.65 \$ 348
50	12/4/2015 Sites 3 & 6	8643 Build berm to dewater at Greenwood Ave. for AT&T	PGE	27.47 ths 16 lds	\$ 12.65 \$ 348 \$ 240.00 \$ 3.840
51	12/7/2015 Sites 3 & 6	8643 Maintain berm for AT&T bore, fill in excavated hole	JD 744H Loader	5.5 hrs	\$ 220.00 \$ 1,210
52	12/7/2015 Sites 3 & 6	8643 Maintain berm for AT&T bore, fill in excavated hole	Laborer Foreman	8 hrs	\$ 105.00 \$ 840
53	12/8/2015 Sites 3 & 6	8643 Dewater at AT&T excavation.	Laborer Foreman	6.5 hrs	\$ 105.00 \$ 683
54	12/8/2015 Sites 3 & 6	8643 Dewater at AT&T excavation.	Laborer Foreman Overtime	1 hrs	\$ 35.85 \$ 36
55	12/14/2015 Sites 3 & 6	8643 Remove berm for AT&T	Cat 938G Wheel Loader	5 hrs	\$ 200.00 \$ 1,000
56	12/14/2015 Sites 3 & 6	8643 Remove berm for AT&T	Komatsu PC490LC-10 Excavator	1.5 hrs	\$ 275.00 \$ 413
57 58	12/14/2015 Sites 3 & 6 12/14/2015 Sites 3 & 6	8643 Remove berm for AT&T 8643 Remove berm for AT&T	Laborer Foreman Laborer	2.5 hrs 2.5 hrs	\$ 105.00 \$ 263 \$ 105.00 \$ 263
59	12/18/2015 Sites 3 & 6	8643 Backfill AT&T excavation	Komatsu PC490LC-10 Excavator	7 hrs	\$ 275.00 \$ 1,925
60	12/18/2015 Sites 3 & 6	8643 Backfill AT&T excavation	Laborer	8.5 hrs	\$ 105.00 \$ 1,923
61	12/18/2015 Sites 3 & 6	8643 Backfill AT&T excavation	Laborer Overtime	0.5 hrs	\$35.85 \$ 18
62	12/18/2015 Sites 3 & 6	8643 Backfill AT&T excavation	Semi Dump Trailer	9.5 hrs	\$ 120.00 \$ 1,140
63	3/8/2016 Sites 3 & 6	8721 Move and stage 4" and 6" HDPE pipe for dewatering	JD 744H Loader	2 Hrs	\$ 220.00 \$ 440
64	3/8/2016 Sites 3 & 6	8721 Move and stage 4" and 6" HDPE pipe for dewatering	Laborer	2 Hrs	\$ 105.00 \$ 210
65	3/9/2016 Sites 3 & 6	8721 Assemble 4" and 6" HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
66	3/10/2016 Sites 3 & 6	8721 Assemble 4" and 6" HDPE pipe for dewatering	JD 744H Loader	4 Hrs	\$ 220.00 \$ 880
67 68	3/10/2016 Sites 3 & 6 3/10/2016 Sites 3 & 6	8721 Assemble 4" and 6" HDPE pipe for dewatering	Laborer 6x4 MJ Reducer	4 Ea 1 Ea	\$ 105.00 \$ 420 \$ 97.75 \$ 98
68	3/10/2016 Sites 3 & 6 3/10/2016 Sites 3 & 6	8721 Assemble 4" and 6" HDPE pipe for dewatering 8721 Assemble 4" and 6" HDPE pipe for dewatering	6x4 MJ Reducer 4 MJ Long Solid Sleeve	1 Ea 3 Ea	\$97.75 \$ 98
70	3/10/2016 Sites 3 & 6	8721 Assemble 4" and 6" HDPE pipe for dewatering	4 MJ Cap	1 Ea	\$34.50 \$ 35
71	3/10/2016 Sites 3 & 6	8721 Assemble 4" and 6" HDPE pipe for dewatering	6 MJ 90 Bend	1 Ea	\$ 132.25 \$ 132
72	4/4/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
73	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
74	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	4 MJ Tee	3 Ea	\$138.00 \$ 414
75	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	6x6 MJ Tee	3 Ea	\$ 189.75 \$ 569
76	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	4" PVC Mega Lug Kit	6 Ea	\$ 39.10 \$ 235
77	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	6" PVC Mega Lug Kit	6 Ea	\$59.80 \$ 359
78	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	4"x12" Black Nipple	3 Ea	\$ 21.85 \$ 66 \$ 56.35 \$ 169
79 80	4/6/2016 Sites 3 & 6 4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering 8721 Install fittings for HDPE pipe for dewatering	6"x12" Black Nipple 4" Black Coupling	3 Ea	\$ 56.35 \$ 169 \$ 32.75 \$ 98
81	4/6/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	6" Black Coupling	3 Ea	\$67.85 \$ 204
82	4/7/2016 Sites 3 & 6	8721 Disassemble HDPE dewatering pipe for fusion	Laborer	4 Hrs	\$ 105.00 \$ 420
83	4/8/2016 Sites 3 & 6	8721 Stage HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
84	4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
85	4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	6 1000 SDR 11 IPS PE 90 Mold	3 Ea	\$41.98 \$ 126
86	4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	6 1000 SDR 11 IPS PE Tee Mold	6 Ea	\$ 55.78 \$ 335
87	4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	4 1000 SDR 11 IPS PE Tee Mold	3 Ea	\$ 22.71 \$ 68
88	4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	6 1000 SDR 11 IPS PE Flg	6 Ea	\$ 20.70 \$ 124
89 90	4/20/2016 Sites 3 & 6 4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering 8721 Install fittings for HDPE pipe for dewatering	6" IPS Plate Lap Joint Flange 4 1000 SDR 11 IPS PE Flg	6 Ea 3 Ea	\$ 12.08 \$ 72 \$ 12.65 \$ 38
91	4/20/2016 Sites 3 & 6	8721 Install fittings for HDPE pipe for dewatering	4" IPS Plate Lap Joint Flange	3 Ea	\$ 9.78 \$ 29
92	4/21/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	JD 744H Loader	4 Hrs	\$ 220.00 \$ 880
93	4/21/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Cat 938G Wheel Loader	4 Hrs	\$ 200.00 \$ 800
94	4/21/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
95	4/21/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Fuse 6" & 4" HDPE Pipe-RJ Underground	4 Hrs	\$ 129.25 \$ 517
96	4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420
97	4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Fuse 6" & 4" HDPE Pipe-RJ Underground	4 Hrs	\$ 129.25 \$ 517
98 99	4/22/2016 Sites 3 & 6 4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	6x4 CI Reducing Comp FLG 6x3 CI Comp FLG F/Steel	3 Ea	\$73.60 \$ 221 \$73.60 \$ 221
100	4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering 8721 Fuse HDPE pipe for dewatering	4x3 DI STD Comp FLG F/Steel	3 Ea	\$ 60.95 \$ 183
100	4/22/2016 Sites 3 & 6 4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering 8721 Fuse HDPE pipe for dewatering	4x3 DI STD Comp FLG F/Steel 4" B Alum QC Male Coupler	3 Ea	\$ 60.95 \$ 183 \$ 27.60 \$ 83
102	4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	4" Alum QC Dust Plug	3 Ea	\$16.10 \$ 48
103	4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	3" B Alum QC Male Coupler	3 Ea	\$ 20.70 \$ 62
104	4/22/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	3" Part "DP" Alum Dust Plug	3 Ea	\$ 9.20 \$ 28
105	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Laborer	8 Hrs	\$10.50 \$ 84
106	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	Fuse 6" & 4" HDPE Pipe-RJ Underground	4 Hrs	\$ 129.25 \$ 517
107	4/25/2016 Sites 3 & 6 4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	4x1/8 FLG FF RR Gasket 6x1/8 FLG FF RR Gasket	3 Ea 6 Ea	\$3.45 \$ 10
108	4/25/2016 Sites 3 & 6 4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	6x1/8 FLG FF RR Gasket 6x4 1000 SDR17 IPS PE Red	6 Ea	\$ 4.03 \$ 24 \$ 27.03 \$ 27
110	4/25/2016 Sites 3 & 6 4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering 8721 Fuse HDPE pipe for dewatering	4 1000 SDR11 IPS PE Cap	1 Ea	\$ 27.03 \$ 27
111	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	NIB 3 FP Ball VLV FIP x FIP	3 Ea	\$189.41 \$ 568
112	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	NIB 4 FP Ball VLV FIP x FIP	1 Ea	\$ 343.41 \$ 343
113	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	4x6 STD Black Nipple	2 Ea	\$ 58.25 \$ 117
114	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	3x6 STD Black Nipple	6 Ea	\$ 42.27 \$ 254
115	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	4 BLK MAL 90 ELL	1 Ea	\$ 122.79 \$ 123
116	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	3/4x520 PTFE Tape G0.35-0.40 Density	3 Ea	\$ 0.69 \$ 2
117	4/25/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering	4 x Close STD Black Nipple	2 Ea	\$41.43 \$ 83
118 119	4/25/2016 Sites 3 & 6 4/26/2016 Sites 3 & 6	8721 Fuse HDPE pipe for dewatering 8721 Test and flush HDPE pipe for dewatering	LACO 1 QT BIC PTFE Paste 42049 Silictite Laborer	1 Ea 4 Hrs	\$ 64.69 \$ 65 \$ 105.00 \$ 420
119	4/26/2016 Sites 3 & 6 4/27/2016 Sites 3 & 6	8721 Test and flush HDPE pipe for dewatering 8721 Test and flush HDPE pipe for dewatering	Laborer	4 Hrs	\$ 105.00 \$ 420 \$ 105.00 \$ 420
120	4/27/2016 Sites 3 & 6 4/29/2016 Sites 3 & 6	8721 Test and flush HDPE pipe for dewatering 8721 Test and flush HDPE pipe for dewatering	Laborer	4 Hrs 3.5 Hrs	\$ 105.00 \$ 420 \$ 105.00 \$ 368
122	5/3/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	6x12-1/2 Clamp	2 Ea	\$120.91 \$ 242
123	5/3/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	Spring Washer	6 Ea	\$ 12.25 \$ 74
124	5/6/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	3" Alum QC Male Coupler	1 Ea	\$18.00 \$ 18
125	5/6/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	3" Part "DP" Alum Dust Plug	1 Ea	\$8.00 \$ 8

AT&T		NSG	Utility/ACM Excavation	NICOR	Dewater	W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	H&S
\$	1,760										
\$	348 3,840										
\$	1,210										
\$	840										
\$	683										
\$	36										
\$	1,000										
\$	413										
\$	263 263										
\$	1,925										
\$	893										
\$	18										
\$	1,140										
					\$ 440						
					\$ 210 \$ 420						
					\$ 880						
					\$ 420						
					\$ 98						
					\$ 248						
					\$ 35						
-					\$ 132 \$ 420						
					\$ 420					-	-
-					\$ 414						
					\$ 569						
					\$ 235						
					\$ 359						
					\$ 66 \$ 169						
					\$ 98						
					\$ 204						
					\$ 420						
					\$ 420						
					\$ 420 \$ 126						
					\$ 335						
					\$ 68						
					\$ 124						
					\$ 72						
					\$ 38 \$ 29						
					\$ 880						
					\$ 800						
					\$ 420						
					\$ 517						
					\$ 420 \$ 517						
-					\$ 221						
					\$ 221						
					\$ 183						
					\$ 83						
-					\$ 48 \$ 62						
					\$ 62					-	-
-					\$ 84						
					\$ 517						
					\$ 10						
					\$ 24						
-					\$ 27 \$ 12						
					\$ 568					-	-
					\$ 343						
					\$ 117						
					\$ 254						
					\$ 123 \$ 2						
-					\$ 83						
-					\$ 65						
					\$ 420						
					\$ 420						
					\$ 368						
-					\$ 242 \$ 74						
-					\$ 18						
					\$ 8						

Table 3
Costs incurred during Site 3 & Site 6 Remediation Work
Campanella & Sons Time and Materials Invoices

Line#	Date Site	Invoice# Scope of Work	Description	Quantity Unit	Unit Cost Tota	al Cost
126	5/6/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	6x3 DI Reducing FLG F/STL	1 Ea	\$ 64.00 \$	
127	5/6/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	5/8 Spring Washer	6 Ea	\$ 10.65 \$	
128	5/6/2016 Sites 3 & 6	8733 HPDE installation equipment for dewatering	6x12-1/2 Clamp	2 Ea	\$ 104.19 \$	
187	6/21/2016 Sites 3 & 6	8753 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	
188	6/22/2016 Sites 3 & 6	8753 Support NSG contractor Meade including dewatering	Cat 938G Wheel Loader	6 Hrs	\$ 200.00 \$	
189	6/22/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	
190	6/22/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	8 Hrs	\$110.00 \$	
191	6/23/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	
192	6/23/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	8 Hrs	\$110.00 \$	
193	6/24/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$ 110.00 \$	
194	6/24/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	8.5 Hrs	\$110.00 \$	
195	6/27/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Laborer	8 Hrs	\$110.00 \$	
196 203	6/27/2016 Sites 3 & 6	8752 Support NSG contractor Meade including dewatering	Six-Wheel Dump	8 Hrs 8 Hrs	\$110.00 \$	
	7/5/2016 Sites 3 & 6	8753 Support NSG contractor Meade including filling			\$ 225.00 \$	
204	7/5/2016 Sites 3 & 6 7/5/2016 Sites 3 & 6	8753 Support NSG contractor Meade including filling 8753 Support NSG contractor Meade including filling	Laborer Six-Wheel Dump	8 Hrs 8 Hrs	\$ 110.00 \$ \$ 110.00 \$	
205	7/6/2016 Sites 3 & 6	8753 Support NSG contractor Meade including filling 8753 Support NSG contractor Meade including filling	Six-Wheel Dump Laborer	8 Hrs	\$ 110.00 \$ \$ 110.00 \$	
206	7/6/2016 Sites 3 & 6 7/7/2016 Sites 3 & 6	8753 Support NSG contractor Meade including filling 8753 Support NSG contractor Meade including filling	Laborer	8 Hrs	\$ 110.00 \$ \$ 110.00 \$	
208	7/8/2016 Sites 3 & 6	8752 Support NSG contractor Meade including filling	Laborer	8 Hrs	\$110.00 \$	
239	8/25/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	1334.4 Ton	\$ 13.50 S	
240	8/26/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	1441.75 Ton	\$ 13.50 \$	
241	8/29/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill- Sand	905.8 Ton	\$ 13.50 \$	
242	8/31/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	869 Ton	\$ 13.50 \$	
243	9/1/2016 Sites 3 & 6	8786 Excavation backfill	Semi Dump	2 Hrs	\$ 120.00 \$	
244	9/1/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	890.55 Ton	\$13.50 \$	
251	9/2/2016 Sites 3 & 6	8786 Excavation backfill	Semi Dump	8 Hrs	\$120.00 \$	
252	9/2/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	1431.1 Ton	\$ 13.50 \$	
255	9/6/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	1459.15 Ton	\$ 13.50 \$	
258	9/7/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	1738.75 Ton	\$ 13.50 \$	
259	9/8/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	1685.85 Ton	\$ 13.50 \$	
260	9/9/2016 Sites 3 & 6	8786 Excavation backfill	Trench Backfill-Sand	737.85 Ton	\$ 13.50 \$	
265	9/10/2016 Sites 3 & 6	8785 Remove HDPE line	Cat 938G	3 Hrs	\$ 200.00 \$	
266	9/10/2016 Sites 3 & 6	8785 Remove HDPE line	Operator Overtime	3 Hrs	\$ 36.60 \$	
267	9/10/2016 Sites 3 & 6	8785 Remove HDPE line	Laborer	4 Hrs	\$ 110.00 \$	
268	9/10/2016 Sites 3 & 6	8785 Remove HDPE line	Laborer	4 Hrs	\$ 30.85 \$	
293	9/23/2016 Sites 3 & 6	8800 Excavation backfill	Trench Backfill-Sand	347.7 Ton	\$ 13.50 \$	
304						
	10/17/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch	Dozer at JM (JD 750K)	8 hrs	\$ 220.00 \$	
305	10/17/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch	Excavator at JM (Cat 330)	8.5 hrs	\$ 240.00 \$	
306	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch	Excavator at JM (Cat 330) Off-Road Truck (Cat D250)	8.5 hrs 8 hrs	\$ 240.00 \$ \$ 230.00 \$	
306 307	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch	Excavator at JM (Cat 330) Off-Road Truck (Cat D250) Off-Road Truck (Cat 725)	8.5 hrs 8 hrs 8 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$	
306 307 308	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch	Excavator at JM (Cat 330) Off-Road Truck (Cat D250) Off-Road Truck (Cat 725) Laborer	8.5 hrs 8 hrs 8 hrs 8 hrs	\$240.00 \$ \$230.00 \$ \$230.00 \$ \$110.00 \$	
306 307 308 309	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch	Excavator at JM (Ca. 330) Off-Road Truck (Cat D250) Off-Road Truck (Cat 725) Laborer Dozer at JM (JD 750K)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 110.00 \$ \$ 220.00 \$	
306 307 308 309 310	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch	Excavator at JM (Cat 330) Off-Road Truck (Cat D250) Off-Road Truck (Cat 725) Laborer Doser at JM (D 750K) Doser at JM (Cat D6)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 2 hrs	\$240.00 \$ \$230.00 \$ \$230.00 \$ \$110.00 \$ \$220.00 \$ \$220.00 \$	
306 307 308 309 310 311	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch	Excavator at JM (Cat 330) Off-Road Truck (Cat 0250) Off-Road Truck (Cat 725) Laborer Dozer at JM (D 750K) Dozer at JM (Cat D6) Excavator at JM (Cat 330)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 2 hrs 9 hrs	\$240.00 \$ \$230.00 \$ \$230.00 \$ \$230.00 \$ \$110.00 \$ \$220.00 \$ \$220.00 \$ \$220.00 \$	
306 307 308 309 310 311 312	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch	Exercetor at AM (Cet 330) OH Road Trusk (Ext D250) Laborer Deser at BM (D7 D30) Deser at AM (Cet D6) Exercetor at AM (Cet 300) OH Road Trusk (Ext 250)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 2 hrs 2 hrs 8 hrs	\$240.00 \$ \$230.00 \$ \$230.00 \$ \$230.00 \$ \$110.00 \$ \$220.00 \$ \$220.00 \$ \$220.00 \$ \$220.00 \$	
306 307 308 309 310 311 312 313	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch	Exervator at AM (Cet 330) Off-Road Truck (cit 250) Off-Road Truck (cit 255) Off-Road Truck (cit 275) Laborer Dozer at AM (D7 50K) Dozer at AM (D7 50K) Dozer at AM (Cit 00) Exervator at AM (Cit 300) Off-Road Truck (Cit 255) Off-Road Truck (Cit 255)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 2 hrs 9 hrs 8 hrs 8 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 110.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 230.00 \$	
306 307 308 309 310 311 312 313 314	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed day to cap Black Dich 8846 Loaded, hauled and placed day to cap Black Dich 8846 Loaded, hauled and placed day to cap Black Dich 8846 Loaded, hauled and placed day to cap Black Dich 8846 Loaded, hauled and placed day to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich 8846 Loaded, hauled and placed days to cap Black Dich	Ceanwiter at AM (Cet 330) OH-Road Trust (Cet 0250) OH-Road Trust (Cet 0250) OH-Road Trust (Cet 1251) Laborer Deser at M (Cet 00) Deser at M (Cet 00) Executor at AM (Cet 330) OH-Road Trust (Cet 0250) OH-Road Trust (Cet 0250) OH-Road Trust (Cet 0250) OH-Road Trust (Cet 0250) Deser at AM (OF 750)	8.5 hrs 8 hrs 8 hrs 8 hrs 2 hrs 9 hrs 8 hrs 4 hrs 4 hrs 4 hrs 4 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 5110.00 \$ \$ 5220.00 \$ \$ 5220.00 \$ \$ 220.00 \$ \$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$	
306 307 308 309 310 311 312 313 314 315	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6	8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch 8846 Loaded, hauled and placed clay to cap Black Ditch	Exervator at AM (Cat 330) OH-Road Trusk (Cat 250) OH-Road Trusk (Cat 2550) OH-Road Trusk (Cat 255) Laborer Dozer at M (Cat 250) Dozer at M (Cat 30) Dozer at M (Cat 30) OH-Road Trusk (Cat 250) OH-Road Trusk (Cat 250) OH-Road Trusk (Cat 250) Dozer at AM (D 7500) Dozer at AM (D 7500)	8 hrs 1 hrs 9 hrs 8 hrs 4 hrs 4 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 510.00 \$ \$ 510.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$	
306 307 308 309 310 311 312 313 314 315 316	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/19/2016 Sites 3 & 6 10/19/2016 Sites 3 & 6	8846. Loaded, hawled and placed day to cap Black Ditch 8846 Loaded, hawled and placed day to cap Black Ditch 8846 Loaded, hawled and placed day to cap Black Ditch 8846 Loaded, hawled and placed day to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch 8846 Loaded, hawled and placed days to cap Black Ditch	Exervator at AM (Crt. 330) OH-Road Trust (Crt. 2500) OH-Road Trust (Crt. 2500) OH-Road Trust (Crt. 250) OH-Road Trust (Crt. 250) Laborer Deser at AM (Crt. 10) Exervator at AM (Crt. 330) OH-Road Trust (Crt. 250) OH-Road Tr	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 2 hrs 2 hrs 9 hrs 8 hrs 4 hrs 4 hrs 4 hrs 4 hrs 4 hrs 45 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 110.00 \$ \$ 110.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$	
306 307 308 309 310 311 312 313 314 315 316 317	10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 10/19/2016 Sites 3 & 6 10/19/2016 Sites 3 & 6	8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch	Exercision at AM (Cat 330) OH Road Trusk (Cat 2550) Laborer Deser at M (Cat 206) Deser at AM (Cat 206) Exercision at AM (Cat 300) OH Road Trusk (Cat 2550) OH Road Trusk (Cat 2550) OH Road Trusk (Cat 2550) Deser at AM (Cat 206) OH Road Trusk (Cat 2550) OH Road Trusk (Cat 2550) OH Road Trusk (Cat 2550)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 9 hrs 9 hrs 9 hrs 4 hrs 4 hrs 4 hrs 4 hrs 4 hrs 4 hrs	\$240.00 \$ \$230.00 \$ \$230.00 \$ \$230.00 \$ \$110.00 \$ \$220.00 \$	
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306 307 308 309 310 311 312 313 314 315 316 317 318 319 320	10/17/2016 Sires 3 & 6 10/18/2016 Sires 3 & 6 11/18/2016 Sires 3 & 6 11/17/2016 Sires 3 & 6	8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed day to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Loaded, hauled and placed days to cap Black Ditch 8846 Capping the Black Ditch	Exervator at M (Cat 330) OH Read Trus (Cat 225) OH Read Trus (Cat 225) Labover Deser at M (Cat 05) Deser at M (Cat 05) Deser at M (Cat 05) Exervator at M (Cat 330) OH Read Trus (Cat 225) Deser at M (Cat 03) OH Read Trus (Cat 225) Deser at M (Cat 03) Deser at M (Cat 05)	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 9 hrs 9 hrs 9 hrs 1 hrs 4 hrs 4 hrs 4 hrs 4 hrs 1 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 110.00 \$ \$ 120.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 230.00 \$	
306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 363 365 366 367 370 371 372 373 374 375 376	10/17/2016 Sites 3 & 6 10/18/2016 Sites 3 & 6 11/18/2016 Sites 3 & 6	8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Loaded, hawled and placed day to cap Black Ditch 8866 Capping She Black Ditch 8866 Capping She 6 & Black Ditch 8866 Capping the Black Ditch	Ceanwater at AM (Cat 330) OH-Road Trusk (cat 2350) OH-Road Trusk (cat 2250) OH-Road Trusk (cat 2250) Laborer Deser at M (cat 06) Executor at M (cat 330) OH-Road Trusk (cat 0320) OH-Road Trusk (cat 2350) Skidsteer at AM (cat 2350) Topical Laborer Skidsteer at AM (Cat 2373) Topical Laborer Skidsteer at AM (Cat 2373) Skidsteer at AM (Cat 2370) Skidsteer at AM (Cat 27017) Topical	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 9 hrs 9 hrs 9 hrs 1 hrs 1 hrs 4 hrs 4 hrs 4 hrs 4 hrs 5 hrs 1 hrs 5 hrs 1 hr	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 110.00 \$ \$ 110.00 \$ \$ 220.00 \$	
306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 363 365 367 370 371 372 373 374 375 376 378	10/17/2016 Stees 3 & 6 10/18/2016 Stees 3 & 6 11/17/2016 Stees 3 & 6	8866 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8868 Loaded, hauled and placed day to cap Black Ditch 8866 Loaded, hauled and placed day to cap Black Ditch 8866 Loaded, hauled and placed day to cap Black Ditch 8866 Capping the Black Ditch	Exervator at AM (Cat 330) OH Road Trusk (Cat 725) Laborer Deser at M (Cat 305) Deser at M (Cat 056) Exervator at AM (Cat 306) Deser at M (Cat 056) Exervator at AM (Cat 306) OH Road Trusk (Cat 0525) OH Road Trusk (Cat 0525) OH Road Trusk (Cat 0525) Deser at AM (Cat 725) Deser at AM (Cat 056) Exervator at AM (Cat 057) Sin-Wheeler at AM Toppol Exervator to Load (10-470) Clay Import (Sem) Deser at AM (Cat 973) Toppol Laborer Siddsteer at AM (Cat 973) Toppol Laborer Siddsteer at AM (Cat 970) Toppol Laborer	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 10 hrs 10 hrs 11 hrs 12 hrs 13 hrs 14 hrs 14 hrs 14 hrs 15 hrs 16 hrs 16 hrs 17 hrs 18 hrs	\$ 240.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 230.00 \$ \$ 110.00 \$ \$ 120.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 220.00 \$ \$ 230.00 \$	
306 307 308 309 310 311 312 313 314 315 316 317 318 320 363 365 366 367 370 371 372 373 374	10/17/2016 Sites 3 & 6 11/17/2016 Sites 3 & 6	8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Capping the Black Ditch	Exervator at AM (Cat 330) OH Road Trust (Cat 2350) OH Road Trust (Cat 2350) OH Road Trust (Cat 2759) Laborer Dezer at M (Cat 05) Exervator at M (Cat 330) OH Road Trust (Cat 2350) Seventer at M (Cat 2350) Louder at AM (Cat 973) Toppool Laborer Skidsteer at M (Cat 973) Toppool Laborer Skidsteer at M (Cat 973) Skidsteer at M (Cat 973) Toppool Laborer	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 9 hrs 9 hrs 9 hrs 4 hrs 4 hrs 4 hrs 4 hrs 4 hrs 1 hrs 5 hrs 1 hr	\$ 240.00 \$ \$ \$230.00 \$ \$ \$ \$230.00 \$ \$ \$ \$ \$230.00 \$ \$ \$ \$ \$ \$230.00 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	
306 307 308 309 309 311 312 313 314 315 316 317 318 320 363 365 363 367 370 371 372 373 374 375 376 378 378 378 378 378 378 378 378	10/17/2016 Sites 3 & 6 11/17/2016 Sites 3 & 6	8866 Loaded, hauled and placed day to cap Black Dich 8866 Capping Stef & Black Dich 8866 Capping the Black Dich 886	Ceanwater at AM (Cet 330) OH Road Trusk (Cet 2759) Laborer Deser at M (Cet 300) Deser at M (Cet 330) OH Road Trusk (Cet 2059) OH Road Trusk (Cet 2059) OH Road Trusk (Cet 2059) Deser at AM (Cet 330) Deser at AM (Cet 330) Deser at AM (Cet 330) OH Road Trusk (Cet 2059) Deser at AM (Cet 330) OH Road Trusk (Cet 2059) Deser at AM (Cet 2059) Sis-Wheeler at AM Toppoll Excavator to Load (10-470) Clay import (Semi) Deser at AM (Cet 400) Loader at AM (Cet 973) Toppoll Laborer Sististeer at AM (Cet 973) Toppoll Laborer Sististeer at AM (Cet 973) Toppoll Laborer	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 9 hrs 9 hrs 1 hr	\$240.00 \$ \$23000 \$ \$23000 \$ \$11000 \$ \$22000 \$ \$22000 \$ \$22000 \$ \$22000 \$ \$22000 \$ \$22000 \$ \$23000 \$ \$2	
306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 366 367 377 373 374 375 376 218	10/17/2016 Sites 3 & 6 11/17/2016 Sites 3 & 6	8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed day to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Londed, hauled and placed days to cap Black Ditch 8866 Longeright to Black Ditch 8866 Capping the Black Ditch	Exerustor at AM (Cat 330) OH Road Trust (Cat 2350) OH Road Trust (Cat 2350) OH Road Trust (Cat 2759) Laborer Dezer at M (Cat 06) Exerustor at AM (Cat 330) OH Road Trust (Cat 2350) Dezer at AM (Cat 330) OH Road Trust (Cat 2350) Dezer at AM (Cat 330) OH Road Trust (Cat 2350) Dezer at AM (Cat 330) OH Road Trust (Cat 2350) Dezer at AM (Cat 330) OH Road Trust (Cat 2350) Seventor at AM (Cat 330) OH Road Trust (Cat 2350) Seventor at AM (Cat 330) OH Road Trust (Cat 2350) Seventor to Load (D 470) Clay Import (Semi) Dezer at AM (Cat 370) Topool Laborer Sekdoter at AM (Cat 370) Topool Laborer Sekdoter at AM (Cat 370) Topool Laborer Sekdoter at AM (Cat 370) Topool	8.5 hrs 8 hrs 8 hrs 8 hrs 8 hrs 8 hrs 9 hrs 9 hrs 9 hrs 8 hrs 1 hrs 4 hrs 4 hrs 4 hrs 4 hrs 4 hrs 1 hr	\$ 240.00 \$ \$ \$230.00 \$ \$ \$ \$230.00 \$ \$ \$ \$ \$230.00 \$ \$ \$ \$ \$ \$230.00 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	

AT&T	NSG	Utility/ACM	NICOR	Dewater	W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	H&S
1	1	Excavation	Г	Ta						
	1			\$ 64 \$ 64	l	l	l	l	 	
				\$ 208						
	\$ 880			3 200						
	\$ 1,200									
	\$ 880									
	\$ 880									
	\$ 880									
	\$ 880									
	\$ 880									
	\$ 935									
	\$ 880									
	\$ 880									
	\$ 1,800									
	\$ 880									
	\$ 880									
	\$ 880									
	\$ 880									
	\$ 880									
							\$ 18,014			
							\$ 19,464			
							\$ 12,228			
							\$ 11,732			
							\$ 240			
							\$ 12,022			
							\$ 960			
							\$ 19,320			
							\$ 19,699			
							\$ 23,473			
							\$ 22,759			
							\$ 9,961			
				\$ 600						
				\$ 110 \$ 440						
				\$ 440 \$ 123						
				\$ 123			\$ 4,694			
							\$ 1,760			
							\$ 2,040			
							\$ 1,840 \$ 1,840			
							\$ 1,840 \$ 880			
							\$ 1,760			
							\$ 1,760			
							\$ 2,160			
							\$ 1,840			
-	-		1				\$ 1,840		-	
 	1		1	-			\$ 880		 	-
	1		1	-			\$ 880		 	
-	-		1				\$ 1,080		-	
-	1		 				\$ 920		+	1
 	1		1	-			\$ 920		 	
-	1		 				\$ 195		+	+
-							\$ 495		H	
-	1		1	1			\$ 2,925		 	
-							\$ 1,500		H	
-	†		1	 			\$ 14,000		 	
-							\$ 1,760		H	
-							\$ 940		H	
	1						\$ 2,080		-	
	1						\$ 2,640		+	
	1						\$ 1,560		-	
							\$ 1,560		†	t
 							\$ 1,820			
				 			\$ 880		 	
-	†		1	 			\$ 3,861		 	
-	\$ 4,551		1	 					 	
 	\$ 241									
 	\$ 1,152									
	\$ 1,008								†	t
\$ 53,548		\$ -	\$ -	\$ 17,675	\$ -	\$ -	\$ 231,862	\$ -	\$ -	\$ -
AT&T	NSG	Utility/ACM	NICOR	Dewater	W. Main	NE Ex.	Fill/Cap	Fib. Opt.	Site Prep	H&S
\$ 53,548			\$ 5.156						\$ 37,410	

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

Line#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)	Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	
179	5/20/2016 Site 3	1080 Dewatering for NSG valve access	Engineering	3	hrs	\$ 120.00 \$	360.00		\$ 360.00
180	5/20/2016 Site 3	1080 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,000.00 \$	1,000.00		\$ 1,000.00
181	5/23/2016 Site 3	1080 Dewatering for NSG valve access	Engineering	3	hrs	\$ 120.00 \$	360.00		\$ 360.00
182	5/23/2016 Site 3	1080 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
183	5/24/2016 Site 3	1080 Dewatering for NSG valve access	Engineering	8	hrs	\$ 120.00 \$	960.00		\$ 960.00
184	5/24/2016 Site 3	1080 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
185	5/25/2016 Site 3	1080 Dewatering for NSG valve access	Engineering	14	hrs	\$ 120.00 \$	1,680.00		\$ 1,680.00
186	5/25/2016 Site 3	1080 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
187	5/26/2016 Site 3	1080 Dewatering for NSG valve access	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
188	5/26/2016 Site 3	1080 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
189	5/27/2016 Site 3	1080 Dewatering for NSG valve access	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
190	5/27/2016 Site 3	1080 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
191	5/31/2016 Site 3	1091 Dewatering for NSG valve access	Engineering	8	hrs	\$ 120.00 \$	960.00		\$ 960.00
192	5/31/2016 Site 3	1091 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
193	6/1/2016 Site 3	1091 Dewatering for NSG valve access	Engineering	8	hrs	\$ 120.00 \$	960.00		\$ 960.00
194	6/1/2016 Site 3	1091 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
195	6/2/2016 Site 3	1091 Dewatering for NSG valve access	Engineering	8	hrs	\$ 120.00 \$	960.00		\$ 960.00
196	6/2/2016 Site 3	1091 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
197	6/2/2016 Site 3	1091 Dewatering for NSG valve access	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
198	6/3/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Engineering	6	hrs	\$ 120.00 \$	720.00		\$ 720.00
199	6/3/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
200	6/3/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
201	6/6/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Engineering	6	hrs	\$ 120.00 \$	720.00		\$ 720.00
202	6/6/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.0
203	6/6/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
204	6/7/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Engineering	6	hrs	\$ 120.00 \$	720.00		\$ 720.00
205	6/7/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.0
206	6/7/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
207	6/8/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Engineering	4	hrs	\$ 120.00 \$	480.00		\$ 480.00
208	6/8/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.0
209	6/8/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
210	6/9/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Engineering	4	hrs	\$ 120.00 \$	480.00		\$ 480.00
211	6/9/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
212	6/9/2016 Site 3	1091 Dewatering for NSG valve access, crane mat installation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
213	6/10/2016 Site 3	1091 Dewatering for NSG valve access	Engineering	6	hrs	\$ 120.00 \$	720.00		\$ 720.00
214	6/10/2016 Site 3	1091 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
215	6/10/2016 Site 3	1091 Dewatering for NSG valve access	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
216	6/13/2016 Site 3	1091 Dewatering for NSG valve access	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
217	6/13/2016 Site 3	1091 Dewatering for NSG valve access	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
218	6/13/2016 Site 3	1091 Dewatering for NSG valve access	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
219	6/14/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
220	6/14/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
221	6/14/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
222	6/15/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
223	6/15/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.0
224	6/15/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
225	6/16/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.0
226	6/16/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.0
227	6/16/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
228	6/17/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Engineering	5	hrs	\$ 120.00 \$	600.00		\$ 600.00
229	6/17/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00	-	\$ 1,500.00

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

Line#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)	Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	RSE, Crew, GH
230	6/17/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
231	6/20/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
232	6/20/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
233	6/20/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
249	6/28/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
250	6/28/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
251	6/28/2016 Site 3	1091 Dewatering for NSG valve access & pipe excavation	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
252	6/29/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
253	6/29/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
254	6/29/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
255	6/30/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
256	6/30/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
257	6/30/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
258	7/1/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
259	7/1/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	Support Crew		day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
260	7/1/2016 Site 3			1		\$ 350.00 \$	350.00		\$ 350.00
200	7/1/2016 Site 3	1091 Dewatering for NSG valve access & pipe work	Guardhouse Attendance	1	day				
					Subtotal	\$	74,530		\$ 74,530
362	8/23/2016 Site 3	1098 Excavated Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
363	8/23/2016 Site 3	1098 Excavated Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
364	8/23/2016 Site 3	1098 Excavated Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
365	8/24/2016 Site 3	1098 Excavated and backfilled Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
366	8/24/2016 Site 3	1098 Excavated and backfilled Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
371	8/29/2016 Site 3	1098 Backfilled Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
372	8/29/2016 Site 3	1098 Backfilled Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
408	9/16/2016 Site 3	1105 Excavated, backfilled and capped Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
409	9/16/2016 Site 3	1105 Excavated, backfilled and capped Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
410	9/16/2016 Site 3	1105 Excavated, backfilled and capped Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
411	9/19/2016 Site 3	1105 Backfilled and capped Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
412	9/19/2016 Site 3	1105 Backfilled and capped Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
413	9/19/2016 Site 3	1105 Backfilled and capped Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
414	9/20/2016 Site 3	1105 Excavated, backfilled and capped Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
415	9/20/2016 Site 3	1105 Excavated, backfilled and capped Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
416	9/20/2016 Site 3	1105 Excavated, backfilled and capped Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
417	9/21/2016 Site 3	1105 Backfilled Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
418	9/21/2016 Site 3	1105 Backfilled Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
419	9/21/2016 Site 3	1105 Backfilled Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
426	9/29/2016 Site 3	1105 Backfilled Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
427	9/29/2016 Site 3	1105 Backfilled Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
428	9/29/2016 Site 3	1105 Backfilled Site 3	Guardhouse Attendance		day	\$ 400.00 \$	400.00		\$ 400.00
429	9/30/2016 Site 3	1105 Backfilled Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
430	9/30/2016 Site 3	1105 Backfilled Site 3		1		\$ 1,550.00 \$	1,550.00		\$ 1,550.00
			Support Crew	1	day				
431	9/30/2016 Site 3	1105 Backfilled Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
432	10/4/2016 Site 3	1114 Capped Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
433	10/4/2016 Site 3	1114 Capped Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
434	10/4/2016 Site 3	1114 Capped Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
435	10/5/2016 Site 3	1114 Capped Site 3	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
436	10/5/2016 Site 3	1114 Capped Site 3	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
437	10/5/2016 Site 3	1114 Capped Site 3	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
441	10/10/2016 Site 3	1114 Site 3 capping	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
442	10/10/2016 Site 3	1114 Site 3 capping	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)	Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	
444	10/11/2016 Site 3	1114 Site 3 capping	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,55
445	10/11/2016 Site 3	1114 Site 3 capping	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 40
446	10/12/2016 Site 3	1114 Site 3 capping	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,95
447	10/12/2016 Site 3	1114 Site 3 capping	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,55
448	10/12/2016 Site 3	1114 Site 3 capping	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 40
449	10/13/2016 Site 3	1114 Site 3 capping	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,95
450	10/13/2016 Site 3	1114 Site 3 capping	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,05
451	10/13/2016 Site 3	1114 Site 3 capping	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 40
452	10/14/2016 Site 3	1114 Site 3 capping	RSE	1	day	\$ 1,950.00 \$			\$ 1,95
453	10/14/2016 Site 3	1114 Site 3 capping	Support Crew	1	day	\$ 1,050.00 \$			\$ 1,0
454	10/14/2016 Site 3	1114 Site 3 capping	Guardhouse Attendance	1	day	\$ 400.00 \$			\$ 40
-13-1	10/14/2010 Site 5	1114 Sicc S cupping	Gallanouse / Mendanee	1	Subtotal	3 400.00 5		۹ .	\$ 55,55
					Site 3 Total	-			\$ 130
282	7/15/2016 Site 6	1095 Site 6 clearing, excavated Site 6 & hauled to Black Ditch	Engineering		hrs	\$ 120.00		, .	\$ 130
				2					\$ 1,50
283	7/15/2016 Site 6	1095 Site 6 clearing, excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$			\$ 1,50
	7/15/2016 Site 6	1095 Site 6 clearing, excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$			
285	7/18/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$			\$ 1,90
286	7/18/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$			\$ 1,5
287	7/18/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$			\$ 3
288	7/19/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$			\$ 1,9
289	7/19/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,5
290	7/19/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 3
291	7/20/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,9
292	7/20/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,5
293	7/20/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 3
294	7/21/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,9
295	7/21/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,5
296	7/21/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 3
297	7/22/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Engineering	4	hrs	\$ 120.00 \$	480.00		\$ 4
298	7/22/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,5
299	7/22/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 3
300	7/25/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,9
301	7/25/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1.500.00 \$	1.500.00		\$ 1.5
302	7/25/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00	350.00		\$ 3
303	7/26/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00			\$ 1,9
304	7/26/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	0.6	day	\$ 1,500.00 \$			\$ 9
305	7/26/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	0.4	day	\$ 1,500.00 \$			\$ 6
306	7/26/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance		day	\$ 350.00 \$			\$ 3
307	7/27/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$			\$ 1,9
				1					
308	7/27/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$			\$ 1,5
309	7/27/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$			
310	7/28/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$			\$ 1,5
311	7/28/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$			\$ 1,
312	7/28/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$			\$
313	7/29/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,900.00 \$			\$ 1,
314	7/29/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,500.00 \$			\$ 1,
315	7/29/2016 Site 6	1095 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$
316	8/1/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,
317	8/1/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,
318	8/1/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 4
	8/2/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	RSF	-	day	\$ 1,950.00 \$		I	\$ 1,5

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

ie#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)	Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	RSE, Crew, G
320	8/2/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
321	8/2/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
322	8/3/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch, sand backfill	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
323	8/3/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch, sand backfill	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
324	8/3/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch, sand backfill	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
325	8/4/2016 Site 6	1098 Backfilled Site 6	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
326	8/4/2016 Site 6	1098 Backfilled Site 6	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
327	8/4/2016 Site 6	1098 Backfilled Site 6	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
328	8/5/2016 Site 6	1098 Backfilled Site 6	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
329	8/5/2016 Site 6	1098 Backfilled Site 6	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
330	8/5/2016 Site 6	1098 Backfilled Site 6	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
359	8/22/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
360	8/22/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	Support Crew		day	\$ 1,550.00 \$	1,550.00		\$ 1,550
361	8/22/2016 Site 6	1098 Excavated Site 6 & hauled to Black Ditch	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
373	8/30/2016 Site 6	1098 Excavated Site 6	RSE		day	\$ 1,950.00 \$	1,950.00		\$ 1,950
374				1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
	8/30/2016 Site 6	1098 Excavated Site 6	Support Crew	1					
375	8/30/2016 Site 6	1098 Excavated Site 6	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
399	9/13/2016 Site 6	1105 Backfilled Site 6	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
400	9/13/2016 Site 6	1105 Backfilled Site 6	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
401	9/13/2016 Site 6	1105 Backfilled Site 6	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
402	9/14/2016 Site 6	1105 Backfilled Site 6	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
403	9/14/2016 Site 6	1105 Backfilled Site 6	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
404	9/14/2016 Site 6	1105 Backfilled Site 6	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
420	9/22/2016 Site 6	1105 Capped Site 6	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
421	9/22/2016 Site 6	1105 Capped Site 6	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
422	9/22/2016 Site 6	1105 Capped Site 6	Guardhouse Attendance	0.125	day	\$ 400.00 \$	50.00		\$ 50
423	9/22/2016 Site 6	1105 Capped Site 6	Guardhouse Attendance	0.875	day	\$ 400.00 \$	350.00		\$ 350
424	9/26/2016 Site 6	1105 Dismantled Site 6 fence	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
425	9/26/2016 Site 6	1105 Dismantled Site 6 fence	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
438	10/7/2016 Site 6	1114 Site 6 capping & stormwater erosion controls	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
439	10/7/2016 Site 6	1114 Site 6 capping & stormwater erosion controls	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050
440	10/7/2016 Site 6	1114 Site 6 capping & stormwater erosion controls	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
464	10/20/2016 Site 6	1114 Southern boundary excavation work	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
465	10/20/2016 Site 6	1114 Southern boundary excavation work	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050
466	10/20/2016 Site 6	1114 Southern boundary excavation work	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
467	10/21/2016 Site 6	1114 Southern boundary excavation work, BD road install	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050
468	10/21/2016 Site 6	1114 Southern boundary excavation work, BD road install	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
471	10/25/2016 Site 6	1114 Southern boundary excavation	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
471	10/25/2016 Site 6	1114 Southern boundary excavation	Support Crew		day	\$ 1,550.00 \$	1,550.00		\$ 1,550
472	10/25/2016 Site 6		Guardhouse Attendance	1		\$ 400.00 \$	400.00		\$ 400
473	10/25/2016 Site 6 10/26/2016 Site 6	1114 Southern boundary excavation	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
		1114 Southern boundary excavation planning		1	day				
475	10/26/2016 Site 6	1114 Southern boundary excavation planning	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
476	10/26/2016 Site 6	1114 Southern boundary excavation planning	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
477	10/27/2016 Site 6	1114 Southern boundary excavation	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
478	10/27/2016 Site 6	1114 Southern boundary excavation	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050
479	10/27/2016 Site 6	1114 Southern boundary excavation	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
480	10/28/2016 Site 6	1114 Southern boundary excavation	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,95
481	10/28/2016 Site 6	1114 Southern boundary excavation	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050
482	10/28/2016 Site 6	1114 Southern boundary excavation	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
490	11/3/2016 Site 6	1122 Dewatered southern boundary excavation	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
									\$ 1,050

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

e#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)		Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	
492	11/3/2016 Site 6	1122 Dewatered southern boundary excavation		Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.0
493	11/4/2016 Site 6	1122 Southern boundary backfilling		RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
494	11/4/2016 Site 6	1122 Southern boundary backfilling		Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.
495	11/4/2016 Site 6	1122 Southern boundary backfilling		Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.0
496	11/7/2016 Site 6	1122 Southern boundary backfilling		Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.
497	11/7/2016 Site 6	1122 Southern boundary backfilling		Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.0
507	11/11/2016 Site 6	1122 Cap southern boundary, temp. fence install		RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
508	11/11/2016 Site 6	1122 Cap southern boundary, temp. fence install		Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.
509	11/11/2016 Site 6	1122 Cap southern boundary, temp. fence install		Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.0
516	11/17/2016 Site 6	1122 Capped Site 6 & Black Ditch, Site 6 fence installation		RSE	1		\$ 1,950.00 \$	1,950.00		\$ 1,950.
517	11/17/2016 Site 6	1122 Capped Site 6 & Black Ditch, Site 6 fence installation		Support Crew	1		\$ 1,550.00 \$	1,550.00		\$ 1,550.
518	11/18/2016 Site 6	1122 Capped Black Ditch, Site 6 fence installation		Support Crew	1		\$ 1,550.00 \$	1,550.00		\$ 1,550.
519	11/21/2016 Site 6	1122 Seeded Black Ditch and Site 6		RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
520	11/21/2016 Site 6	1122 Seeded Black Ditch and Site 6		Support Crew	1		\$ 1,550.00 \$	1,550.00		\$ 1,550.
320	11/21/2010 Site 0	1122 Seeded Black Brich and Site 0		Заррот стем	1	Subtotal	\$ 1,550.00 \$	122,170.00	c	\$ 122,170.0
						Site 6 Total	\$	122,170.00		\$ 122,170.
400	0/4/2045 67 2.0 6	4004 4707 11 1 1 1 1 1 1	1707	205					\$ -	
103	9/1/2015 Sites 3 & 6	1031 AT&T cable installation on poles	AT&T	RSE	1		\$ 1,900.00 \$	1,900.00		\$ 1,900.
104	9/1/2015 Sites 3 & 6	1031 AT&T cable installation on poles	AT&T	Support Crew	1		\$ 1,500.00 \$	1,500.00		\$ 1,500.
105	9/1/2015 Sites 3 & 6	1031 AT&T cable installation on poles	AT&T	Guardhouse Attendance	1	,	\$ 350.00 \$	350.00		\$ 350.
128	12/15/2015 Sites 3 & 6	1044 AT&T cable installation underground	AT&T	RSE	1		\$ 1,900.00 \$	1,900.00		\$ 1,900.
129	12/15/2015 Sites 3 & 6	1044 AT&T cable installation underground	AT&T	Support Crew	1	,	\$ 1,500.00 \$	1,500.00		\$ 1,500.
130	12/15/2015 Sites 3 & 6	1044 AT&T cable installation underground	AT&T	Guardhouse Attendance	1		\$ 350.00 \$	350.00		\$ 350.
115	12/2/2015 Sites 3 & 6	1044 AT&T for project completion schedule meeting on-site	AT&T	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.
131	12/18/2015 Sites 3 & 6	1044 Backfill AT&T excavation	AT&T	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.
132	12/18/2015 Sites 3 & 6	1044 Backfill AT&T excavation	AT&T	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.
133	12/18/2015 Sites 3 & 6	1044 Backfill AT&T excavation	AT&T	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.
116	12/4/2015 Sites 3 & 6	1044 Build berm to dewater at Greenwood Ave. for AT&T	AT&T	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.
117	12/4/2015 Sites 3 & 6	1044 Build berm to dewater at Greenwood Ave. for AT&T	AT&T	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500
118	12/4/2015 Sites 3 & 6	1044 Build berm to dewater at Greenwood Ave. for AT&T	AT&T	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.
122	12/8/2015 Sites 3 & 6	1044 Dewater at AT&T excavation.	AT&T	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900
123	12/8/2015 Sites 3 & 6	1044 Dewater at AT&T excavation.	AT&T	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500
124	12/8/2015 Sites 3 & 6	1044 Dewater at AT&T excavation.	AT&T	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.
100	8/31/2015 Sites 3 & 6	1031 Excavate access holes on Greenwood Ave for AT&T	AT&T	RSE	1	day	\$ 1.900.00 \$	1,900.00		\$ 1,900.
101	8/31/2015 Sites 3 & 6	1031 Excavate access holes on Greenwood Ave for AT&T	AT&T	Support Crew	1		\$ 1,500.00 \$	1,500.00		\$ 1,500
102	8/31/2015 Sites 3 & 6	1031 Excavate access holes on Greenwood Ave for AT&T	AT&T	Guardhouse Attendance	1		\$ 350.00 \$	350.00		\$ 350.
106	9/3/2015 Sites 3 & 6	1031 Excavate test holes on Greenwood Ave for AT&T	AT&T	RSE		day	\$ 1,900.00 \$	1,900.00		\$ 1,900
107	9/3/2015 Sites 3 & 6	1031 Excavate test holes on Greenwood Ave for AT&T	AT&T	Support Crew	1		\$ 1,500.00 \$	1,500.00		\$ 1,500
108	9/3/2015 Sites 3 & 6	1031 Excavate test holes on Greenwood Ave for AT&T	AT&T	Guardhouse Attendance	1		\$ 350.00 \$	350.00		\$ 350.
119	12/7/2015 Sites 3 & 6	1044 Maintain berm for AT&T bore, fill in excavated hole	AT&T	RSE	1			1,900.00		\$ 1,900
		· · · · · · · · · · · · · · · · · · ·			1					
120	12/7/2015 Sites 3 & 6	1044 Maintain berm for AT&T bore, fill in excavated hole	AT&T	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500
121	12/7/2015 Sites 3 & 6	1044 Maintain berm for AT&T bore, fill in excavated hole	AT&T	Guardhouse Attendance	1		\$ 350.00 \$	350.00		\$ 350
109	10/19/2015 Sites 3 & 6	1036 Place barrier wall for AT&T	AT&T	RSE	1		\$ 1,900.00 \$	1,900.00		\$ 1,900
110	10/19/2015 Sites 3 & 6	1036 Place barrier wall for AT&T	AT&T	Support Crew	1		\$ 1,500.00 \$	1,500.00		\$ 1,500
111	10/19/2015 Sites 3 & 6	1036 Place barrier wall for AT&T	AT&T	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350
112	11/13/2015 Sites 3 & 6	1040 Place barrier wall for AT&T	AT&T	RSE	1	,	\$ 1,900.00 \$	1,900.00		\$ 1,900
113	11/13/2015 Sites 3 & 6	1040 Place barrier wall for AT&T	AT&T	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500
114	11/13/2015 Sites 3 & 6	1040 Place barrier wall for AT&T	AT&T	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350
125	12/14/2015 Sites 3 & 6	1044 Remove berm for AT&T	AT&T	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900
126	12/14/2015 Sites 3 & 6	1044 Remove berm for AT&T	AT&T	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500
	12/14/2015 Sites 3 & 6	1044 Remove berm for AT&T	AT&T	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350
127	12/14/2013 Sites 3 & 0			dual dilouse Attendance						

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

Line#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)		Description	Quantity	Unit		Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	RSE, Crew, GH
34	5/7/2015 Sites 3 & 6	1007 Utility pole installation to reroute AT&T cables	AT&T	Support Crew	1	day	\$	1,500.00 \$	1,500.00		\$ 1,500.0
35	5/7/2015 Sites 3 & 6	1007 Utility pole installation to reroute AT&T cables	AT&T	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$ 350.0
						Subtotal		\$	45,350.00	\$ -	\$ 45,350.0
166	4/21/2016 Sites 3 & 6	1071 Fuse HDPE pipe for dewatering	Dewatering	Engineering		hrs	\$	120.00 \$	240.00		\$ 240.0
167	4/21/2016 Sites 3 & 6				2		\$	1.000.00 \$	1.000.00		\$ 1,000.0
168	4/21/2016 Sites 3 & 6	1071 Fuse HDPE pipe for dewatering	Dewatering Dewatering	Support Crew	1	day	\$	1,000.00 \$	1,000.00		\$ 1,000.0
		1071 Fuse HDPE pipe for dewatering		Engineering	1						
169 170	4/22/2016 Sites 3 & 6 4/22/2016 Sites 3 & 6	1071 Fuse HDPE pipe for dewatering	Dewatering Dewatering	Engineering	1	hrs	\$	1,000.00 \$	1,000.00		\$ 120.0 \$ 1,000.0
		1071 Fuse HDPE pipe for dewatering		Support Crew	1	day	\$				
171	4/25/2016 Sites 3 & 6	1071 Fuse HDPE pipe for dewatering	Dewatering	RSE	1	day	\$	1,900.00 \$	1,900.00		\$ 1,900.0
172	4/25/2016 Sites 3 & 6	1071 Fuse HDPE pipe for dewatering	Dewatering	Support Crew	1	day	\$	1,000.00 \$	1,000.00		
164	4/20/2016 Sites 3 & 6	1071 HDPE fusion	Dewatering	Engineering	4	hrs	\$	120.00 \$	480.00		\$ 480.0
144	3/9/2016 Sites 3 & 6	1060 HPDE dewatering line installation	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
145	3/10/2016 Sites 3 & 6	1060 HPDE dewatering line installation	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
146	3/11/2016 Sites 3 & 6	1060 HPDE dewatering line installation	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
159	4/4/2016 Sites 3 & 6	1071 HPDE dewatering line installation	Dewatering	Engineering	6	hrs	\$	120.00 \$	720.00	\$ 720.00	
161	4/6/2016 Sites 3 & 6	1071 HPDE dewatering line installation	Dewatering	Engineering	6	hrs	\$	120.00 \$	720.00		\$ 720.0
162	4/7/2016 Sites 3 & 6	1071 HPDE dewatering line installation	Dewatering	Engineering	6	hrs	\$	120.00 \$	720.00		\$ 720.0
163	4/8/2016 Sites 3 & 6	1071 HPDE dewatering line installation	Dewatering	Engineering	3	hrs	\$	120.00 \$	360.00		\$ 360.0
140	3/1/2016 Sites 3 & 6	1055 HPDE dewatering line planning	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
142	3/7/2016 Sites 3 & 6	1060 HPDE dewatering line planning	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
143	3/8/2016 Sites 3 & 6	1060 HPDE dewatering line planning	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
141	3/2/2016 Sites 3 & 6	1055 HPDE dewatering line planning, NSWRD permitting	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
165	4/20/2016 Sites 3 & 6	1071 Install fittings for HDPE pipe for dewatering	Dewatering	Support Crew	1	day	\$	1,000.00 \$	1,000.00		\$ 1,000.
148	3/15/2016 Sites 3 & 6	1060 NSWRD dewatering discharge permit planning	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
150	3/21/2016 Sites 3 & 6	1060 NSWRD dewatering discharge permit planning	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
154	3/24/2016 Sites 3 & 6	1060 NSWRD dewatering discharge permit planning	Dewatering	Engineering	8	hrs	\$	120.00 \$	960.00	\$ 960.00	
134	1/13/2016 Sites 3 & 6	1048 NSWRD permitting	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
135	1/26/2016 Sites 3 & 6	1048 NSWRD permitting	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
138	2/17/2016 Sites 3 & 6	1055 NSWRD permitting	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
139	2/23/2016 Sites 3 & 6	1055 NSWRD permitting	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
534	12/21/2016 Sites 3 & 6	1129 NSWRD Reporting, Campanella comm.	Dewatering	Engineering	4	hrs	\$	125.00 \$	500.00	\$ 500.00	
528	12/5/2016 Sites 3 & 6	1129 NSWRD Reporting, fence planning, Campanella comm.	Dewatering	Engineering	4	hrs	\$	125.00 \$	500.00	\$ 500.00	
173	4/26/2016 Sites 3 & 6	1071 Test and flush HDPE pipe for dewatering	Dewatering	RSE	1	day	\$	1,900.00 \$	1,900.00	,	\$ 1,900.
174	4/26/2016 Sites 3 & 6	1071 Test and flush HDPE pipe for dewatering	Dewatering	Support Crew	1	day	\$	1,000.00 \$	1,000.00		\$ 1,000.
175	4/27/2016 Sites 3 & 6	1071 Test and flush HDPE pipe for dewatering	Dewatering	RSE	1	day	Ś	1,900.00 \$	1,900.00		\$ 1,900.
176	4/27/2016 Sites 3 & 6	1071 Test and flush HDPE pipe for dewatering	Dewatering	Support Crew	1	day	\$	1,000.00 \$	1,000.00		\$ 1,000.
177	4/29/2016 Sites 3 & 6	1071 Test and flush HDPE pipe for dewatering	Dewatering	Engineering	2	hrs	\$	120.00 \$	240.00		\$ 240.0
178	4/29/2016 Sites 3 & 6	1071 Test and flush HDPE pipe for dewatering	Dewatering	Support Crew	1	day	\$	1,000.00 \$	1,000.00		\$ 1,000.
170	4,23,2010 3.103 3 4 0	10/1 restallation to pipe for devotering	benutering	Зарроте стем	1	Subtotal		\$	21,500.00	\$ 5,800.00	
334	8/9/2016 Sites 3 & 6	1098 Backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$	1,950.00 \$	1,950.00		\$ 1,950.
335	8/9/2016 Sites 3 & 6	1098 Backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	Ś	1,550.00 \$	1,550.00		\$ 1,550.
336	8/9/2016 Sites 3 & 6	1098 Backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$	400.00 \$	400.00		\$ 400.0
337	8/10/2016 Sites 3 & 6	1098 Backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	Ś	1,950.00 \$	1,950.00	<u> </u>	\$ 1,950.
338	8/10/2016 Sites 3 & 6	1098 Backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew		day	s	1,550.00 \$	1,550.00	<u> </u>	\$ 1,550
339	* *			**	1		ş S	400.00 \$	400.00		\$ 1,550
339	8/10/2016 Sites 3 & 6	1098 Backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$	1,950.00 \$	1,950.00		\$ 1,950
	8/31/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day					
377	8/31/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$	1,550.00 \$	1,550.00		\$ 1,550.
378	8/31/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$	400.00 \$	400.00		\$ 400.0
379	9/1/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day	\$	1,950.00 \$	1,950.00		\$ 1,950

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)		Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	
380	9/1/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.
381	9/1/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.
382	9/2/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
383	9/2/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.
384	9/2/2016 Sites 3 & 6	1098 Backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.
385	9/6/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
386	9/6/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.
387	9/6/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.
388	9/7/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
389	9/7/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
390	9/7/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.
397	9/12/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
398	9/12/2016 Sites 3 & 6	1105 Backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance		day	\$ 400.00 \$	400.00		\$ 400.
512	11/15/2016 Sites 3 & 6	1122 Cap Site 3, Site 6 fence installation	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.
					1					
513	11/15/2016 Sites 3 & 6	1122 Cap Site 3, Site 6 fence installation	Filling and Excavating	Support Crew	1	day		1,550.00		\$ 1,550 \$ 1,950
510	11/14/2016 Sites 3 & 6	1122 Cap Sites 3 & 6, Site 6 fence installation	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		
511	11/14/2016 Sites 3 & 6	1122 Cap Sites 3 & 6, Site 6 fence installation	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
455	10/17/2016 Sites 3 & 6	1114 Capped Black Ditch	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
456	10/17/2016 Sites 3 & 6	1114 Capped Black Ditch	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
457	10/17/2016 Sites 3 & 6	1114 Capped Black Ditch	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
458	10/18/2016 Sites 3 & 6	1114 Capped Black Ditch, prepared for S. boundary excav.	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
459	10/18/2016 Sites 3 & 6	1114 Capped Black Ditch, prepared for S. boundary excav.	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
460	10/18/2016 Sites 3 & 6	1114 Capped Black Ditch, prepared for S. boundary excav.	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
461	10/19/2016 Sites 3 & 6	1114 Capped Black Ditch, prepared for S. boundary excav.	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
462	10/19/2016 Sites 3 & 6	1114 Capped Black Ditch, prepared for S. boundary excav.	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
463	10/19/2016 Sites 3 & 6	1114 Capped Black Ditch, prepared for S. boundary excav.	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
514	11/16/2016 Sites 3 & 6	1122 Capped Sites 3 & 6 & Black Ditch, Site 6 fence installation	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
515	11/16/2016 Sites 3 & 6	1122 Capped Sites 3 & 6 & Black Ditch, Site 6 fence installation	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
331	8/8/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
332	8/8/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
333	8/8/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
340	8/11/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
341	8/11/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
342	8/11/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
343	8/12/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating			day	\$ 1,550.00 \$	1,550.00		\$ 1,550
		· · · · · · · · · · · · · · · · · · ·		Support Crew	1					
344	8/12/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
345	8/15/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
346	8/15/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
347	8/15/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
348	8/16/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
349	8/16/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
350	8/16/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
351	8/17/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950
352	8/17/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
353	8/17/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
354	8/18/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,95
355	8/18/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,55
356	8/18/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400
357	8/19/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550
	-,, 2020 31103 3 4 0		ond Excurating	Support Crew	1	auy	- 1,550.00 J			
358	8/19/2016 Sites 3 & 6	1098 Excavated & backfilled Site 6, excavated Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

ine#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)		Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	RSE, Crew, GH
406	9/15/2016 Sites 3 & 6	1105 Excavated Site 3 and capping Site 3 & Site 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
407	9/15/2016 Sites 3 & 6	1105 Excavated Site 3 and capping Site 3 & Site 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
391	9/8/2016 Sites 3 & 6	1105 Excavated Site 6, backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
392	9/8/2016 Sites 3 & 6	1105 Excavated Site 6, backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
393	9/8/2016 Sites 3 & 6	1105 Excavated Site 6, backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
394	9/9/2016 Sites 3 & 6	1105 Excavated Site 6, backfilled Sites 3 & 6	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
395	9/9/2016 Sites 3 & 6	1105 Excavated Site 6, backfilled Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
396	9/9/2016 Sites 3 & 6	1105 Excavated Site 6, backfilled Sites 3 & 6	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
367	8/25/2016 Sites 3 & 6	1098 Excavated Sites 3 & 6 and backfilled Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
368	8/25/2016 Sites 3 & 6	1098 Excavated Sites 3 & 6 and backfilled Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
369	8/26/2016 Sites 3 & 6	1098 Excavated Sites 3 & 6 and backfilled Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
370	8/26/2016 Sites 3 & 6	1098 Excavated Sites 3 & 6 and backfilled Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
273	7/12/2016 Sites 3 & 6	1095 Prepared Black Ditch for import	Filling and Excavating	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
274	7/12/2016 Sites 3 & 6	1095 Prepared Black Ditch for import	Filling and Excavating	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
275	7/12/2016 Sites 3 & 6	1095 Prepared Black Ditch for import	Filling and Excavating	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00	1	\$ 350.00
521	11/22/2016 Sites 3 & 6	1122 Seeded Black Ditch and Sites 3 & 6	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
522	11/22/2016 Sites 3 & 6	1122 Seeded Black Ditch and Sites 3 & 6	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
523	11/23/2016 Sites 3 & 6	1122 Seeded Site 6, Site 3 fence work, stabilized Black Ditch	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
524	11/23/2016 Sites 3 & 6	1122 Seeded Site 6. Site 3 fence work, stabilized Black Ditch	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00	+	\$ 1,550.00
485	11/1/2016 Sites 3 & 6	1122 Site 3 cap drainage and Site 6 fence dismantlement	Filling and Excavating	Support Crew	1	day	\$ 1,050.00 \$	1,050.00	+	\$ 1,050.00
486	11/1/2016 Sites 3 & 6	1122 Site 3 cap drainage and Site 6 fence dismantlement	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
501	11/9/2016 Sites 3 & 6	1122 Southern boundary backfilling, Site 3 fence work	Filling and Excavating	RSE		day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
502	11/9/2016 Sites 3 & 6	1122 Southern boundary backfilling, Site 3 fence work	Filling and Excavating	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.00
503	11/9/2016 Sites 3 & 6	1122 Southern boundary backfilling, Site 3 fence work	Filling and Excavating	Guardhouse Attendance		day	\$ 400.00 \$	400.00		\$ 400.00
487	11/2/2016 Sites 3 & 6	1122 Southern boundary backfilling, Sites 3 & 6 fence work	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
488	11/2/2016 Sites 3 & 6	1122 Southern boundary backfilling, Sites 3 & 6 fence work			1		\$ 1,050.00 \$	1,050.00		\$ 1,050.00
			Filling and Excavating	Support Crew	1	day		400.00		\$ 400.00
489 483	11/2/2016 Sites 3 & 6	1122 Southern boundary backfilling, Sites 3 & 6 fence work	Filling and Excavating	Guardhouse Attendance	1	day				
	10/31/2016 Sites 3 & 6	1122 Southern boundary excavation backfilling, cap Site 3	Filling and Excavating	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.00
484	10/31/2016 Sites 3 & 6	1122 Southern boundary excavation backfilling, cap Site 3	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
469	10/24/2016 Sites 3 & 6	1114 Southern boundary excavation work, Site 3 cap grading	Filling and Excavating	Support Crew	1	day	\$ 1,550.00 \$	1,550.00		\$ 1,550.00
470	10/24/2016 Sites 3 & 6	1114 Southern boundary excavation work, Site 3 cap grading	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
498	11/8/2016 Sites 3 & 6	1122 Southern boundary excavation, Site 3 fence work	Filling and Excavating	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
499	11/8/2016 Sites 3 & 6	1122 Southern boundary excavation, Site 3 fence work	Filling and Excavating	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.00
500	11/8/2016 Sites 3 & 6	1122 Southern boundary excavation, Site 3 fence work	Filling and Excavating	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
						Subtotal	\$	120,150.00	\$ -	\$ 120,150.00
531	12/14/2016 Sites 3 & 6	1129 Campanella invoicing, Fence invoicing and AT&T planning	General	Engineering	8	hrs	\$ 125.00 \$	1,000.00	\$ 1,000.00	
532	12/19/2016 Sites 3 & 6	1129 Campanella invoicing, Fence invoicing and AT&T planning	General	Engineering	6	hrs	\$ 125.00 \$	750.00	\$ 750.00	
276	7/13/2016 Sites 3 & 6	1095 Construction of stabilized construction entrance	General	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
277	7/13/2016 Sites 3 & 6	1095 Construction of stabilized construction entrance	General	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
278	7/13/2016 Sites 3 & 6	1095 Construction of stabilized construction entrance	General	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00		\$ 350.00
279	7/14/2016 Sites 3 & 6	1095 Construction of stabilized construction entrance	General	RSE	1	day	\$ 1,900.00 \$	1,900.00		\$ 1,900.00
280	7/14/2016 Sites 3 & 6	1095 Construction of stabilized construction entrance	General	Support Crew	1	day	\$ 1,500.00 \$	1,500.00		\$ 1,500.00
281	7/14/2016 Sites 3 & 6	1095 Construction of stabilized construction entrance	General	Guardhouse Attendance	1	day	\$ 350.00 \$	350.00	 	\$ 350.00
149	3/16/2016 Sites 3 & 6	1060 EPA communication regarding NSG & NSWRD status	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
- 8	3/20/2015 Sites 3 & 6	1000 EPA meeting	General	RSE	1	day	\$ 1,900.00 \$	1,900.00	\$ 1,900.00	
530	12/9/2016 Sites 3 & 6	1129 Fence completion planning, Campanella & ComEd comm.	General	Engineering	2	hrs	\$ 125.00 \$	250.00	\$ 250.00	
529	12/6/2016 Sites 3 & 6	1129 Fence completion planning, Campanella comm.	General	Engineering	2	hrs	\$ 125.00 \$	250.00	\$ 250.00	
533	12/0/2016 Sites 3 & 6	1129 Fence invoicing and AT&T planning	General	Engineering	4	hrs	\$ 125.00 \$	500.00	\$ 500.00	
	11/30/2016 Sites 3 & 6	1122 Final inspections of Sites 3 & 6	General	RSE		day	\$ 1,950.00 \$	1,950.00	5 330.00	\$ 1,950.00
525		TIEL I HIGH HISPECTIONS OF SILES 2 OC 0	General		1	uay	÷ 1,550.00 \$	1,530.00	1	.00.00 ب

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

Line#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineering)		Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	RSE, Crew, GH
527	12/1/2016 Sites 3 & 6	1122 Final inspections of Sites 3 & 6	General	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
60	6/22/2015 Sites 3 & 6	1021 Post-bid meetings	General	RSE	1	day	\$ 1,900.00 \$	1,900.00	\$ 1,900.00	
61	6/23/2015 Sites 3 & 6	1021 Post-bid meetings	General	RSE	1	day	\$ 1,900.00 \$	1,900.00	\$ 1,900.00	
45	5/27/2016 Sites 3 & 6	1007 Pre-bid meeting and AT&T meeting on-site	General	RSE	1	day	\$ 1,900.00 \$	1,900.00	\$ 1,900.00	
504	11/10/2016 Sites 3 & 6	1122 Relocating S. boundary temp fence, Site 3 fence work	General	RSE	1	day	\$ 1,950.00 \$	1,950.00		\$ 1,950.00
505	11/10/2016 Sites 3 & 6	1122 Relocating S. boundary temp fence, Site 3 fence work	General	Support Crew	1	day	\$ 1,050.00 \$	1,050.00		\$ 1,050.00
506	11/10/2016 Sites 3 & 6	1122 Relocating S. boundary temp fence, Site 3 fence work	General	Guardhouse Attendance	1	day	\$ 400.00 \$	400.00		\$ 400.00
69	7/8/2015 Sites 3 & 6	1022 SW Sites bid & Greenwood Ave crossing support	General	Engineering	6	hrs	\$ 120.00 \$	720.00	\$ 720.00	
70	7/9/2015 Sites 3 & 6	1022 SW Sites bid & Greenwood Ave crossing support	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
71	7/10/2015 Sites 3 & 6	1022 SW Sites bid clarification request	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
72	7/13/2015 Sites 3 & 6	1022 SW Sites bid clarification request	General	Engineering	1	hrs	\$ 120.00 \$	120.00	\$ 120.00	
1	3/10/2015 Sites 3 & 6	994 SW Sites bid spec preparation	General	Engineering	11	hrs	\$ 120.00 \$	1,320.00	\$ 1,320.00	
2	3/11/2015 Sites 3 & 6	994 SW Sites bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
3	3/12/2015 Sites 3 & 6	994 SW Sites bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
4	3/13/2015 Sites 3 & 6	994 SW Sites bid spec preparation	General	Engineering		hrs	\$ 120.00 \$	600.00	\$ 600.00	
5		1000 SW Sites bid spec preparation	General	Engineering	5	hrs	\$ 120.00 \$	480.00	\$ 480.00	
6	3/16/2015 Sites 3 & 6				4					
	3/18/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	4	hrs	,	480.00	\$ 480.00	
7	3/19/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
9	3/23/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	1.5	hrs	\$ 120.00 \$	180.00	\$ 180.00	
10	3/24/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
11	3/25/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	7	hrs	\$ 120.00 \$	840.00	\$ 840.00	
12	3/27/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	1.5	hrs	\$ 120.00 \$	180.00	\$ 180.00	
13	3/30/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
14	4/1/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
15	4/6/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	1.5	hrs	\$ 120.00 \$	180.00	\$ 180.00	
18	4/10/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
19	4/15/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	5	hrs	\$ 120.00 \$	600.00	\$ 600.00	
20	4/16/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	5.5	hrs	\$ 120.00 \$	660.00	\$ 660.00	
21	4/16/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	0.5	hrs	\$ 120.00 \$	60.00	\$ 60.00	
22	4/17/2015 Sites 3 & 6	1000 SW Sites bid spec preparation	General	Engineering	7	hrs	\$ 120.00 \$	840.00	\$ 840.00	
25	4/22/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	6	hrs	\$ 120.00 \$	720.00	\$ 720.00	
26	4/23/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	5	hrs	\$ 120.00 \$	600.00	\$ 600.00	
27	4/28/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	6	hrs	\$ 120.00 \$	720.00	\$ 720.00	
28	4/30/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
29	5/1/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	3.5	hrs	\$ 120.00 \$	420.00	\$ 420.00	
30	5/4/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
31	5/5/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
36	5/8/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
37	5/14/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
38	5/15/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
39	5/18/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering		hrs	\$ 120.00 \$	720.00	\$ 720.00	
40	5/19/2015 Sites 3 & 6	1007 SW Sites bid spec preparation 1007 SW Sites bid spec preparation	General		6	hrs	\$ 120.00 \$	240.00	\$ 720.00	
				Engineering	2					
41	5/20/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
42	5/21/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
43	5/22/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
44	5/26/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	7	hrs	\$ 120.00 \$	840.00	\$ 840.00	
46	5/28/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
47	5/29/2015 Sites 3 & 6	1007 SW Sites bid spec preparation	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
23	4/20/2015 Sites 3 & 6	1007 SW Sites bid spec preparation & utility pole prep for AT&T	General	Engineering	5	hrs	\$ 120.00 \$	600.00	\$ 600.00	
24	4/21/2015 Sites 3 & 6	1007 SW Sites bid spec preparation & utility pole prep for AT&T	General	Engineering	6	hrs	\$ 120.00 \$	720.00	\$ 720.00	
32	5/6/2015 Sites 3 & 6	1007 SW Sites bid spec preparation & utility pole prep for AT&T	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

ne#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineer	ring)	Description	Quantity	Unit	Unit Rate	Total Cost	Bid Spec., Permitting, Meetings, Engineering	RSE, Crev
58	6/18/2015 Sites 3 & 6	1021 SW Sites bid summary	General	Engineering	5	hrs	\$ 120.00 \$	600.00	\$ 600.00	
59	6/19/2015 Sites 3 & 6	1021 SW Sites bid summary	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
48	6/1/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
49	6/3/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
50	6/4/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	1	hrs	\$ 120.00 \$	120.00	\$ 120.00	
51	6/5/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
52	6/8/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
53	6/9/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
54	6/10/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
55	6/11/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
56	6/12/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	2.5	hrs	\$ 120.00 \$	300.00	\$ 300.00	
57	6/17/2015 Sites 3 & 6	1021 SW Sites bidding support	General	Engineering	1	hrs	\$ 120.00 \$	120.00	\$ 120.00	
68	7/7/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
73	7/14/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
74	7/15/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
75	7/15/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
77	7/17/2015 Sites 3 & 6	1022 SW Sites bidding support	General			hrs	\$ 120.00 \$	360.00	\$ 360.00	
78	7/20/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering Engineering	3	hrs	\$ 120.00 \$	720.00	\$ 720.00	
	* *	•			6			480.00	\$ 480.00	
79	7/21/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$			
80	7/22/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
81	7/23/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	2.5	hrs	\$ 120.00 \$	300.00	\$ 300.00	
82	7/24/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
83	7/27/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
84	7/28/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
85	7/29/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
86	7/30/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	5	hrs	\$ 120.00 \$	600.00	\$ 600.00	
87	7/31/2015 Sites 3 & 6	1022 SW Sites bidding support	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
76	7/16/2015 Sites 3 & 6	1022 SW Sites bidding support & AT&T coordination	General	Engineering	3	hrs	\$ 120.00 \$	360.00	\$ 360.00	
88	8/3/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
89	8/4/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	1	hrs	\$ 120.00 \$	120.00	\$ 120.00	
91	8/5/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
93	8/6/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
94	8/7/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
95	8/10/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
96	8/11/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
97	8/12/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
98	8/13/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	6	hrs	\$ 120.00 \$	720.00	\$ 720.00	
99	8/14/2015 Sites 3 & 6	1027 SW Sites evaluation/award assistance	General	Engineering	4	hrs	\$ 120.00 \$	480.00	\$ 480.00	
62	6/24/2015 Sites 3 & 6	1021 SW Sites Post-bid meeting summary	General	Engineering	5	hrs	\$ 120.00 \$	600.00	\$ 600.00	
63	6/26/2015 Sites 3 & 6	1021 SW Sites Post-bid meeting summary	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
67	7/6/2015 Sites 3 & 6	1022 SW Sites RAWP revision	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
64	6/30/2015 Sites 3 & 6	1021 SW Sites re-bid bid spec preparation	General	Engineering		hrs	\$ 120.00 \$	720.00	\$ 720.00	
					6					
65	7/1/2015 Sites 3 & 6	1021 SW Sites re-bid bid spec preparation	General	Engineering	8	hrs	\$ 120.00 \$	960.00	\$ 960.00	
66	7/2/2015 Sites 3 & 6	1021 SW Sites re-bid bid spec preparation	General	Engineering	6	hrs	\$ 120.00 \$	720.00	\$ 720.00	
90	8/4/2015 Sites 3 & 6	1027 Update Site 3 cost estimate	General	Engineering	2	hrs	\$ 120.00 \$	240.00	\$ 240.00	
16	4/7/2015 Sites 3 & 6	1000 Utility meetings	General	RSE	1	day	\$ 1,900.00 \$	1,900.00	\$ 1,900.00	
17	4/8/2015 Sites 3 & 6	1000 Utility meetings	General	RSE	1	day	\$ 1,900.00 \$	1,900.00	\$ 1,900.00	
						Subtotal	\$	74,300.00	\$ 57,950.00	\$ 16
264	7/6/2016 Sites 3 & 6	1091 Crane mat removal	NSG	RSE	1	day	\$ 1,900.00 \$	1,900.00	<u> </u>	\$ 1
265	7/6/2016 Sites 3 & 6	1091 Crane mat removal	NSG	Support Crew	1	day	\$ 1,500.00 \$	1,500.00	-	\$ 1

Table 4
Costs incurred during Site 3 & Site 6 Remediation Work
DMP PE PC Invoices

ine#	Date Site	Invoice# Scope of Work (Contractor Supervision or Engineerin	g)	Description	Quantity	Unit	Unit	t Rate	Total Cost	ec., Permitting, gs, Engineering	RSE, Crev
266	7/6/2016 Sites 3 & 6	1091 Crane mat removal	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00	 1	\$ 3
234	6/21/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	RSE	1	day	\$ 1	1,900.00 \$	1,900.00		\$ 1,9
235	6/21/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
236	6/21/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$ 3
237	6/22/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	RSE	1	day	\$ 1	1,900.00 \$	1,900.00		\$ 1,5
238	6/22/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
239	6/22/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$
240	6/23/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Engineering	5.5	hrs	\$	120.00 \$	660.00		\$
241	6/23/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
242	6/23/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$ 3
243	6/24/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Engineering	8	hrs	\$	120.00 \$	960.00		\$ 9
244	6/24/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
245	6/24/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$
246	6/27/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	RSE	1	day	\$ 1	1,900.00 \$	1,900.00	\neg	\$ 1,
247	6/27/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
248	6/27/2016 Sites 3 & 6	1091 Dewatering for NSG valve access & pipe excavation	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$
267	7/7/2016 Sites 3 & 6	1091 Filling NSG excavations	NSG	RSE	1	day	\$ 1	1,900.00 \$	1,900.00		\$ 1,
268	7/7/2016 Sites 3 & 6	1091 Filling NSG excavations	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1
269	7/7/2016 Sites 3 & 6	1091 Filling NSG excavations	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$
270	7/8/2016 Sites 3 & 6	1091 Filling NSG excavations	NSG	RSE	1	day	\$ 1	1,900.00 \$	1,900.00		\$ 1,
271	7/8/2016 Sites 3 & 6	1091 Filling NSG excavations	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
272	7/8/2016 Sites 3 & 6	1091 Filling NSG excavations	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$
261	7/5/2016 Sites 3 & 6	1091 Filling NSG valve excavation	NSG	Engineering	2	hrs	\$	120.00 \$	240.00		\$
262	7/5/2016 Sites 3 & 6	1091 Filling NSG valve excavation	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00		\$ 1,
263	7/5/2016 Sites 3 & 6	1091 Filling NSG valve excavation	NSG	Guardhouse Attendance	1	day	\$	350.00 \$	350.00		\$
136	2/10/2016 Sites 3 & 6	1055 NSG agreement review	NSG	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	i
137	2/11/2016 Sites 3 & 6	1055 NSG agreement review	NSG	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	ī
92	8/5/2015 Sites 3 & 6	1027 NSG utility communication	NSG	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	·
147	3/14/2016 Sites 3 & 6	1060 NSG utility work planning	NSG	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	ī
151	3/22/2016 Sites 3 & 6	1060 NSG utility work planning	NSG	Support Crew	1	day	\$ 1	1,500.00 \$	1,500.00	\$ 1,500.00	i
153	3/23/2016 Sites 3 & 6	1060 NSG utility work planning	NSG	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	ĺ .
160	4/5/2016 Sites 3 & 6	1071 NSG utility work planning	NSG	Engineering	6	hrs	\$	120.00 \$	720.00	\$ 720.00	i
155	3/30/2016 Sites 3 & 6	1060 NSG utility work planning & NSWRD permitting	NSG	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	1
152	3/22/2016 Sites 3 & 6	1060 NSG utility work planning, meeting at NSG	NSG	RSE	1	day	\$ 1	1,900.00 \$	1,900.00	\$ 1,900.00	í
						Subtotal		\$	35,470.00	\$ 5,560.00	\$ 29,
156	3/31/2016 Sites 3 & 6	1060 NSG and Nicor utility planning	NSG and Nicor	Engineering	2	hrs	\$	120.00 \$	240.00	\$ 240.00	
157	4/1/2016 Sites 3 & 6	1060 NSG and Nicor utility planning	NSG and Nicor	Engineering	1	hrs	\$	120.00 \$	120.00	\$ 120.00	i
158	4/1/2016 Sites 3 & 6	1060 NSG and Nicor utility planning	NSG and Nicor	Engineering	3	hrs	\$	120.00 \$	360.00	\$ 360.00	
						Subtotal		\$	720.00	\$ 720.00	\$
	Sites 3 & 6				S	Site 3 and 6 To	tal	\$	297,490.00	\$ 70,030.00	\$ 227,

Total

\$

761,681

Table 5
Costs incurred during Site 3 & Site 6 Remediation Work
Other Invoices

May 11	2017						
IVIUY 11	., 2017						
Clean	Cut Tree Care			(Work	complete	d June 2015)	
Line#	Description		Quantity Unit	Unit C	ost	Total Cost	
	1 Clear Site 6 of trees and grind stumps		1 LS	\$	4,500	\$	4,500
	2			Total		Ś	4,500
						·	
Action	Fence		(Work com	pleted	October -	December, 20	016)
Line#	Description		Quantity Unit	Unit (Cost	Total Cost	
	3 Site 3 Fence & Gate Construction		1 LS	\$	58,225	\$	58,225
	4 Site 6 Fence & Gate Construction		1 LS	\$	99,050	\$	99,050
	5			Subto		\$	157,275
	6			Credi	t Memo	\$	(2,332
	7			Total		\$	154,944
AT&T				(Wor	k complete	ed 2015 - 201	7)
Line#	Description		Quantity Unit	Unit (Cost	Total Cost	
	8 Engineering Labor		1 LS	\$	65,978	\$	65,978
	9 Material Cost		1 LS	\$	32,129	\$	32,129
	10 Construction Labor		1 LS	\$	86,415	\$	86,415
	11 Contractor Cost		1 LS	\$	135,767	\$	135,767
	12 Misc. Tax		1 LS	\$	-	\$	-
	13			Total		\$	320,289
North	Shore Gas (NSG)			(Wor	k complete	ed 2015 - 2010	6)
Line#	<u>Description</u>		Quantity Unit	Unit (Cost	Total Cost	
	14 June 2015	(Site 4/5)	1 LS	\$	2,700	\$	2,700
	15 September 2015	(Site 4/5)	1 LS	\$	69,869	\$	69,869
	16 December 2015	(Site 4/5)	1 LS	\$	92	\$	92
	17 June 2016		1 LS	\$	131,543	\$	131,543
	18 July 2016		1 LS	\$	56,978	\$	56,978
	19			Total		\$	261,182
North	Shore Water Reclamation District (NSW	RD)		(Wor	k complete	ed 2016)	
Line#	<u>Description</u>		Quantity Unit	Unit (Cost	Total Cost	
	22 Flow Monitoring Report - June 2016		9,395 x1000 gals		1	\$	10,898
	23 Flow Monitoring Report - July 2016		496 x1000 gals		1	\$	575
	24 Flow Monitoring Report - August 2016		8,011 x1000 gals	\$	1	-	9,293
	25			Total		\$	20,766

ElectEderotronfiid Friling Received, Cleck's Office it 10/2/01392019

Exhibit D Manikas Invoice Table

ElectElectroniid Friting Received in Coech's 'Office it 10/2/01392019 Manikas Invoice Table

Invoice Number	Invoice Period	Invoice Amount Site 3, 6 and 4/5	Invoice Amount related to work on Site 4/5	Invoice Amount Site 3 and Site 6	Utilities	IDOT Allocation*
84915	2/7/14 to 3/25/14	\$ 3,900	\$ 351	\$ 3,549	Mainly North Shore Gas	\$ 2,342
87865	6/10/14 to 6/27/14	\$ 4,602	\$ -	\$ 4,602	Mainly AT&T, North Shore Gas	\$ 3,037
90804	7/1/14 to 7/31/14	\$ 8,351	\$ 591	\$ 7,760	AT&T, North Shore Gas	\$ 5,122
91588	8/1/14 to 8/24/14	\$ 5,304	\$ -	\$ 5,304	AT&T, North Shore Gas, ComEd	\$ 3,501
97236	9/3/14 to 3/31/15	\$ 28,041	\$ 3,120	\$ 24,921	AT&T, North Shore Gas, Covenants	\$ 16,448
99401	4/1/15 to 5/29/15	\$ 24,375	\$ 1,950	\$ 22,425	AT&T, North Shore Gas, Covenants	\$ 14,801
100183	6/2/15 to 6/30/15	\$ 8,346	\$ 3,237	\$ 5,109	AT&T, North Shore Gas	\$ 3,372
100973	7/1/15 to 7/30/15	\$ 9,555	\$ 3,354	\$ 6,201	AT&T, North Shore Gas	\$ 4,093
101847	8/3/15 to 8/28/15	\$ 5,148	\$ 1,092	\$ 4,056	AT&T, North Shore Gas	\$ 2,677
102636	9/1/15 to 9/30/15	\$ 4,251	\$ 3,900	\$ 351	AT&T, North Shore Gas	\$ 232
104852	10/2/15 to 11/25/15	\$ 9,750	\$ 2,964	\$ 6,786	AT&T, North Shore Gas	\$ 4,479
106362	12/1/15 to 1/28/16	\$ 4,485	\$ 2,223	\$ 2,262	Mainly North Shore Gas	\$ 1,493
109227	2/2/16 to 4/27/16	\$ 15,132	\$ 1,989	\$ 13,143	Mainly North Shore Gas	\$ 8,674
111298	5/3/16 to 6/1/16	\$ 2,379	\$ -	\$ 2,379	Mainly North Shore Gas	\$ 1,570
		,			Total	\$ 71,840

^{*}Used 66% on all entries even though some entries were clearly all or mostly related to Site 3 and 6 and there was overall significantly more work legal support work performed for Sites 3 and 6. Included redacted entries only when clear that Sites 3 and/or 6 were involved. Did not include fully redacted entries or entries where the majority of the work was related to the North Shore Sanitary District (e.g., 2-17-14, 7-1-14, 7-7-14, 12-5-14, 12-29-14, 1-16-15, 1-28-15, 2-2-15, 12-3-15, 2-4-15, 3-12-15, 3-23-15, 4-10-15, 5-4-15, 5-27-15, 6-17-15, 6-18-15, 6-23-15, 6-26-15, 7-6-15, 7-8-15, 7-9-15, 7-13-15, 7-16-15, 8-7-15, 8-11-15, and 8-28-15).

ElectEderotronfiid Friling Received, Cleck's Office it 10/2/01392019

Exhibit E Johns Manville Payment Records

Elect Electron Filing Received, Cleck's Offorfit 10/2/01392019

JM PAYMENTS (except for payments to EPA)

PO Number	Vendor Account Name	Mat.	Inv. Value	Posting Date	SAP Invoice	Vendor Inv. Ref.	Year	Check #	Encashment #	Comment
4900013679	ACTION FENCE CONTRACTORS, INC.	\$	(2,331.50)	1/17/2017	5702029826	120616CRD	2017	4100403338	1/12/2017	CR Applied to invoice
										24001
4900013679	ACTION FENCE CONTRACTORS, INC.	\$	154,943.50	12/28/2016	500772489	24001	2016	4100403338	1/12/2017	
4900002326	AECOM	\$	33.75	12/18/2012	5016662600	37290104	2012	4100403339	1/12/2017	
4900002326	AECOM	\$	535.39	12/18/2012	5016662600	37290104	2102	4100403339	1/12/2017	
4900002326	AECOM	\$	21,706.35	12/18/2012	5016662600	37290104	2102	4100403339	1/12/2017	
4900002326	AECOM	\$	30,121.00	12/18/2012	5016662600	37290104	2102	4100403339	1/12/2017	
4900002326	AECOM	\$	1,121.93	12/18/2012	5016662600	37290104	2102	4100403339	1/12/2017	
4900002326	AECOM	\$	11.40	12/18/2012	5016662600	37290104	2102	4100403339	1/12/2017	
4900002326	AECOM	\$	24,672.56	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	4,102.50	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	7,136.42	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	18,989.74	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	14.14	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	2,572.50	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	1,923.41	4/12/2013	5019002690	37317325	2013	4100164050	4/23/2013	
4900002326	AECOM	\$	28,818.71	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	40.00	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	3,668.51	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	12,019.20	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	1,668.95	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	3,852.50	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	35,900.00	5/13/2013	5019641723	37327818	2013	4100171554	6/4/2013	
4900002326	AECOM	\$	18,054.64	8/1/2013	5021314599	37337583	2013	4100183555	8/6/2013	
4900002326	AECOM	\$	18,077.57	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	25,944.44	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	73,442.69	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	5,838.34	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	1,022.22	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	97,013.72	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	24,544.60	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	6,874.17	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	633.27	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900002326	AECOM	\$	15,408.46	9/9/2013	5022160807	37370125	2013	4100198916	10/29/2013	
4900005819	AECOM	\$	43,734.51	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	12,517.50	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	12,157.66	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	3,522.50	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	2,271.60	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	660.49	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	58,973.02	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	15,912.91	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	15,111.91	9/27/2013	5022553893	37381058	2013	4100205770	12/5/2013	
4900005819	AECOM	\$	(2.02)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	

Г	T				T		T	1		_
4900005819		\$	(0.17)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819		\$	(8.48)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	(13.23)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	(2.52)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	(3.84)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	2.02	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	0.17	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	8.48	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	13.23	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM	\$	2.52	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819		\$	3.84	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819		\$	(0.55)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819		\$	0.55	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819		\$	(2.94)	10/18/2013	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819		\$	2.94)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	+
4900005819		\$	26,347.92	12/30/2013	5024641292	37402932	2013	4100214079	3/3/2014	+
4900005819		_			5024641292					
		\$	5,820.42	12/30/2013		37402932	2013	4100221102	3/3/2014	
4900005819		\$	2,366.25	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819		\$	1,818.75	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819		\$	1,480.94	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819		\$	70,826.27	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819		\$	31,135.63	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819		\$	25,417.65	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819		\$	15,741.68	12/30/2013	5024641292	37402932	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	300.00	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	73.60	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	10,571.57	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	570.00	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	1,072.50	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	142.50	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	20.52	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819	AECOM	\$	1,357.71	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819		\$	18,584.14	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819		\$	35,328.58	12/30/2013	5024641258	37404085	2013	4100221102	3/3/2014	
4900005819		\$	150.96	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	35.44	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	13,797.01	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	<u> </u>
4900005819		\$	30,541.17	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	<u> </u>
4900005819		\$	27,169.86	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	22,734.45	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	150.00	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	9,698.29	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
										
4900005819		\$	8,464.29	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	18,594.19	2/10/2014	5025517465	37414324	2014	4100231282	4/24/2014	
4900005819		\$	13,088.75	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819		\$	12,526.79	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819	JAECOM	\$	243.68	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	<u> </u>

T	T	 			T		1	T T		
4900005819		\$	41,931.26	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819		\$	3,222.15	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819	AECOM	\$	3,388.18	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819	AECOM	\$	153.44	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819	AECOM	\$	82,662.42	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819	AECOM	\$	2.02	3/19/2014	5026386548	37425097	2014	4100236148	5/19/2014	
4900005819	AECOM	\$	(0.28)	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819	AECOM	\$	-	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819	AECOM	\$	(3,420.68)	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	0.28	5/7/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	3,420.68	5/7/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	(1,367.76)	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	(3,027.88)	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	(237.02)	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	3,027.88	5/7/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	237.02	5/7/2014	5025532087	37436418	2014	4100244878	7/7/2014	+
4900005819		\$	1,367.76	5/7/2014	5025532087	37436418	2014	4100244878	7/7/2014	+
		+ '								
4900005819		\$	34,667.15	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	2,713.67	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	3.15	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	39,164.51	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	15,659.89	5/6/2014	5025532087	37436418	2014	4100244878	7/7/2014	
4900005819		\$	10,089.16	7/17/2014	5029023902	37455694	2014	4100257654	9/12/2014	
4900005819		\$	72.21	7/17/2014	5029023902	37455694	2014	4100257654	9/12/2014	
4900005819		\$	402.50	7/17/2014	5029023902	37455694	2014	4100257654	9/12/2014	
4900007391	AECOM	\$	50,334.38	9/30/2014	5701163522	37475770	2014	4100272548	12/1/2014	
4900007391	AECOM	\$	52,652.01	9/30/2014	5701163522	37475770	2014	4100272548	12/2/2014	
4900007391	AECOM	\$	317.62	9/30/2014	5701163522	37475770	2014	4100272548	12/3/2014	
4900007391	AECOM	\$	14,652.39	9/30/2014	5701163522	37475770	2014	4100272548	12/4/2014	
4900007391	AECOM	\$	150,604.01	9/30/2014	5701163522	37475770	2014	4100272548	12/5/2014	
4900007391	AECOM	\$	1,648.75	9/30/2014	5701163522	37475770	2014	4100272548	12/6/2014	
4900007391	AECOM	\$	18,665.74	9/30/2014	5701163522	37475770	2014	4100272548	12/7/2014	
4900007391	AECOM	\$	6,737.59	11/24/2014	5701215000	37489528	2014	4100281529	1/26/2015	
4900007391	AECOM	\$	25,481.58	11/24/2014	5701215000	37489528	2014	4100281529	1/27/2015	
4900007391	AECOM	\$	43,140.92	11/24/2014	5701215000	37489528	2014	4100281529	1/28/2015	
4900007391		\$	2,170.00	11/24/2014	5701215000	37489528	2014	4100281529	1/29/2015	
4900007391		\$	22,968.72	11/24/2014	5701215000	37489528	2014	4100281529	1/30/2015	
4900007391		\$	2,053.95	11/24/2014	5701215000	37489528	2014	4100281529	1/31/2015	
4900007391		\$	3,251.85	11/24/2014	5701215000	37489528	2014	4100281529	2/1/2015	<u> </u>
4900007391		\$	23,908.57	1/19/2015	5701263113	37501030	2015	4100287883	3/2/2015	†
4900007391		\$	95,835.95	1/19/2015	5701263113	37501030	2015	4100287883	3/3/2015	
4900007391		\$	1,007.86	1/19/2015	5701263113	37501030	2015	4100287883	3/4/2015	
4900007391		\$	32,742.13	1/19/2015	5701263113	37501030	2015	4100287883	3/5/2015	+
4900007391		\$	85,748.96	1/19/2015	5701263113	37501030	2015	4100287883	3/6/2015	
4900007391		\$	1,860.28	1/19/2015	5701263113	37501030	2015	4100287883	3/7/2015	
4900007391		\$	3,774.87	1/19/2015	5701263113	37501030	2015	4100287883	3/8/2015	
4900007391	ALCOM	\$	47,571.59	3/26/2015	5701379841	37519174	2015	4100304141	6/1/2015	

4000007704 450044	T	2/25/2015	F704070044	07540474	2015	4400004444	6/2/2045	T
4900007391 AECOM	\$ 58,127.66	3/26/2015	5701379841	37519174	2015	4100304141	6/2/2015	
4900007391 AECOM	\$ 172.78	3/26/2015	5701379841	37519174	2015	4100304141	6/3/2015	
4900007391 AECOM	\$ 31,702.66	3/26/2015	5701379841	37519174	2015	4100304141	6/4/2015	
4900007391 AECOM	\$ 46,489.61	3/26/2015	5701379841	37519174	2015	4100304141	6/5/2015	
4900007391 AECOM	\$ 12,868.19	3/26/2015	5701379841	37519174	2015	4100304141	6/6/2015	
4900007391 AECOM	\$ 20,289.42	3/26/2015	5701379841	37519174	2015	4100304141	6/7/2015	
4900007391 AECOM	\$ 46,385.26	6/19/2015	5701411326	37579851	2015	4100319553	8/25/2015	
4900007391 AECOM	\$ 112,495.09	6/19/2015	5701411326	37579851	2015	4100319553	8/26/2015	
4900007391 AECOM	\$ 39,744.48	6/19/2015	5701411326	37579851	2015	4100319553	8/27/2015	
4900007391 AECOM	\$ 169.09	6/19/2015	5701411326	37579851	2015	4100319553	8/28/2015	
4900007391 AECOM	\$ 3,086.30	6/19/2015	5701411326	37579851	2015	4100319553	8/29/2015	
4900007391 AECOM	\$ 12,713.24	6/19/2015	5701411326	37579851	2015	4100319553	8/30/2015	
4900007391 AECOM	\$ 20,192.00	6/19/2015	5701411326	37579851	2015	4100319553	8/31/2015	
4900007391 AECOM	\$ 28,918.91	9/16/2015	5701503044	37617264	2015	4100332652	11/5/2015	
4900007331 AECOM	\$ 41,079.95	9/16/2015	5701503044	37617264	2015	4100332652	11/6/2015	
4900007391 AECOM	\$ 37.20	9/16/2015	5701503044	37617264	2015	4100332652	11/7/2015	
4900007391 AECOM	†			37617264		4100332652		
	+ ' ' +	9/16/2015	5701503044		2015		11/8/2015	
4900007391 AECOM	\$ 126,321.84	9/16/2015	5701503044	37617264	2015	4100332652	11/9/2015	
4900007391 AECOM	\$ 59,123.41	9/16/2015	5701503044	37617264	2015	4100332652	11/10/2015	
4900007391 AECOM	\$ 42,880.01	9/16/2015	5701503044	37617264	2015	4100332652	11/11/2015	
4900007391 AECOM	\$ 9,612.20	2/12/2016	5701503044	37679934	2016	4100352135	3/4/2016	
4900007391 AECOM	\$ 14,658.75	2/12/2016	5701503044	37679934	2016	4100352136	3/5/2016	
4900007391 AECOM	\$ 28,268.54	2/12/2016	5701503044	37679934	2016	4100352136	3/6/2016	
4900011082 AECOM	\$ 1,982.75	1/25/2016	5701636955	37691001	2016	4100356851	4/1/2016	
4900011082 AECOM	\$ 72,949.97	1/25/2016	5701636955	37691001	2016	4100356851	4/2/2016	
4900011082 AECOM	\$ 852.50	1/25/2016	5701636955	37691001	2016	4100356851	4/3/2016	
4900011082 AECOM	\$ 298,192.55	1/25/2016	5701636955	37691001	2016	4100356851	4/4/2016	
4900011082 AECOM	\$ 53,331.81	1/25/2016	5701636955	37691001	2016	4100356851	4/5/2016	
4900011082 AECOM	\$ 39,564.55	1/25/2016	5701636955	37691001	2016	4100356851	4/6/2016	
4900011082 AECOM	\$ 12,900.00	3/21/2016	5701685867	37711966	2016	4100358068	04/8/216	
4900011082 AECOM	\$ 11,864.76	3/21/2016	5701685867	37711966	2016	4100358068	04/8/217	
4900011082 AECOM	\$ 64,143.54	3/21/2016	5701685867	37711966	2016	4100358068	04/8/218	
4900011082 AECOM	\$ 10,434.48	3/21/2016	5701685867	37711966	2016	4100358068	04/8/219	
4900011082 AECOM	\$ 5,309.12	3/21/2016	5701685867	37711966	2016	4100358068	04/8/220	
4900011082 AECOM	\$ 22,150.25	3/21/2016	5701685867	37711966	2016	4100358068	04/8/221	
4900011082 AECOM	\$ 70,188.06	3/21/2016	5701685867	37711966	2016	4100358068	04/8/222	
4900011082 AECOM	\$ 22,713.68	3/21/2016	5701685867	37711966	2016	4100358068	04/8/223	
4900011082 AECOM	\$ 3,896.25	4/15/2016	5701083807	37732228	2016	4100338008	5/23/2016	
4900011082 AECOM	\$ 8,360.39	4/15/2016	5701724582	37732228	2016	4100365238	5/24/2016	
	· · · · · · · · · · · · · · · · · · ·		5701724582		ł			
4900011082 AECOM		4/15/2016		37732228	2016	4100365238	5/25/2016	
4900011082 AECOM	\$ 3,594.16	4/15/2016	5701724582	37732228	2016	4100365238	5/26/2016	
4900011082 AECOM	\$ 792.50	4/15/2016	5701724582	37732228	2016	4100365238	5/27/2016	
4900011082 AECOM	\$ 4,905.00	4/15/2016	5701724582	37732228	2016	4100365238	5/28/2016	
4900011082 AECOM	\$ 3,086.65	4/15/2016	5701724582	37732228	2016	4100365238	5/29/2016	
4900011082 AECOM	\$ 15,629.15	4/15/2016	5701724582	37732228	2016	4100365238	5/30/2016	
4900011082 AECOM	\$ 5,365.43	5/5/2016	5701746267	37741266	2016	4100373504	7/11/2016	
4900011082 AECOM	\$ 15,567.76	5/5/2016	5701746267	37741266	2016	4100373504	7/12/2016	

Laccontraction		= /= /oo.c		0==44066	1 0046	I	7/10/2016	1
4900011082 AECOM	\$ 36,451.26	5/5/2016	5701746267	37741266	2016	4100373504	7/13/2016	
4900011082 AECOM	\$ 3,857.50	5/5/2016	5701746267	37741266	2016	4100373504	7/14/2016	
4900011082 AECOM	\$ 380.00	5/5/2016	5701746267	37741266	2016	4100373504	7/15/2016	
4900011082 AECOM	\$ 4,933.71	5/5/2016	5701746267	37741266	2016	4100373504	7/16/2016	
4900011082 AECOM	\$ 912.50	5/5/2016	5701746267	37741266	2016	4100373504	7/17/2016	
4900011082 AECOM	\$ 20,965.27	6/15/2016	5701795371	37763387	2016	4100380548	8/22/2016	
4900011082 AECOM	\$ 8,813.37	6/15/2016	5701795371	37763387	2016	4100380548	8/23/2016	
4900011082 AECOM	\$ 32,092.48	6/15/2016	5701795371	37763387	2016	4100380548	8/24/2016	
4900011082 AECOM	\$ 540.00	6/15/2016	5701795371	37763387	2016	4100380548	8/25/2016	
4900011082 AECOM	\$ 467.50	6/15/2016	5701795371	37763387	2016	4100380548	8/26/2016	
4900011082 AECOM	\$ 1,157.76	6/15/2016	5701795371	37763387	2016	4100380548	8/27/2016	
4900011082 AECOM	\$ 67.50	6/15/2016	5701795371	37763387	2016	4100380548	8/28/2016	
4900011082 AECOM	\$ 3,503.75	6/15/2016	5701795371	37763387	2016	4100380548	8/29/2016	
4900011082 AECOM	\$ 17,738.87	6/15/2016	5701795371	37763387	2016	4100380548	8/30/2016	
4900011082 AECOM	\$ 3,288.25	8/2/2016	5701849200	37785606	2016	4100385809	9/23/2016	
4900011082 AECOM	\$ 36,813.08	8/2/2016	5701849200	37785606	2016	4100385809	9/24/2016	
4900011082 AECOM	\$ 4,491.96	8/2/2016	5701849200	37785606	2016	4100385809	9/25/2016	
4900011082 AECOM	\$ 77.50	8/2/2016	5701849200	37785606	2016	4100385809	9/26/2016	
4900011082 AECOM	\$ 9,854.77	8/2/2016	5701849200	37785606	2016	4100385809	9/27/2016	
4900011082 AECOM	\$ 295.58	8/2/2016	5701849200	37785606	2016	4100385809	9/28/2016	
4900011082 AECOM	\$ 1,125.00	8/2/2016	5701849200	37785606	2016	4100385809	9/29/2016	
4900011082 AECOM	\$ 11,905.82	8/2/2016	5701849200	37785606	2016	4100385809	9/30/2016	
4900011082 AECOM	\$ 8,746.25	9/27/2016	5701905859	37812003	2016	4100397061	12/1/2016	
4900011082 AECOM	\$ 27,600.53	9/27/2016	5701905859	37812003	2016	4100397062	12/2/2016	
4900011082 AECOM	\$ 387.50	9/27/2016	5701905859	37812003	2016	4100397063	12/3/2016	
4900011082 AECOM	\$ 3,203.76	9/27/2016	5701905859	37812003	2016	4100397064	12/4/2016	
4900011082 AECOM	\$ 77,746.51	9/27/2016	5701905859	37812003	2016	4100397065	12/5/2016	
4900011082 AECOM	\$ 155,376.56	9/27/2016	5701905859	37812003	2016	4100397066	12/6/2016	
4900011082 AECOM	\$ 8,589.00	11/7/2016	5701956324	37830683	2016	4100399840	12/19/2016	
4900011082 AECOM	\$ 1,765.50	11/7/2016	5701956324	37830683	2016	4100399841	12/20/2016	
4900011082 AECOM	\$ 232.50	11/7/2016	5701956324	37830683	2016	4100399842	12/21/2016	
4900011082 AECOM	\$ 215.00	11/7/2016	5701956324	37830683	2016	4100399843	12/22/2016	
4900011082 AECOM	\$ 38,945.09	11/7/2016	5701956324	37830683	2016	4100399844	12/23/2016	
4900011082 AECOM	\$ 593.83	11/7/2016	5701956324	37830683	2016	4100399845	12/24/2016	
4900011082 AECOM	\$ 953.02	2/9/2017	5702061661	37873931	2017	4100416191	3/19/2017	
4900011082 AECOM	\$ 6,823.40	2/9/2017	5702061661	37873931	2017	4100416191	3/20/2017	
4900011082 AECOM	\$ 19,284.30	2/9/2017	5702061661	37873931	2017	4100416191	3/21/2017	
4900011082 AECOM	\$ 48,803.70	2/9/2017	5702061661	37873931	2017	4100416191	3/22/2017	
4900011082 AECOM 4900011082 AECOM	\$ 5,895.00	2/9/2017	5702061661	37873931	2017	4100416191	3/23/2017	
4900011082 AECOM	\$ 3,833.00	2/9/2017	5702061661	37873931	2017	4100416191	3/24/2017	
4900011082 AECOM	\$ 8,212.30	2/9/2017	5702061661	37873931	2017	4100416191	3/25/2017	
4900011082 AECOM 4900011082 AECOM	\$ 1,025.16	2/9/2017	5702061661	37873931	2017	4100416191	3/26/2017	
4900011082 AECOM 4900011082 AECOM	\$ 15,674.38	2/9/2017	5702061661	37873931	2017	4100416191	3/27/2017	
4900011082 AECOM	\$ 1,374.84	2/9/2017	5702061661	37873931	2017	4100416191	3/28/2017	
4900011082 AECOM 4900011082 AECOM	\$ 1,374.84			37873931		4100416191		
		2/9/2017	5702061661		2017	4100416191	3/29/2017	
4900011082 AECOM 4900011082 AECOM	\$ 9,010.26	2/9/2017	5702061661	37873931	2017		3/30/2017	
4900011082 AECOIVI	\$ 15,969.40	2/9/2017	5702061661	37873931	2017	4100416191	3/31/2017	

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-	AECOM TECHNICAL SERVICES INC	\$	(0.51)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
	AECOM TECHNICAL SERVICES INC	\$	(2.95)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM TECHNICAL SERVICES INC	\$	(1.66)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
	AECOM TECHNICAL SERVICES INC	\$	(0.21)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM TECHNICAL SERVICES INC	\$	(10.40)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM TECHNICAL SERVICES INC	\$	(9.97)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM TECHNICAL SERVICES INC	\$	(3.84)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900005819	AECOM TECHNICAL SERVICES INC	\$	(4.21)	1/14/2014	5021391356	37385674	2013	4100214079	1/21/2014	
4900002839	ARCADIS	\$	2,460.68	8/21/2012	5014242602	458047	2012	4100121735	9/11/2012	
4900002839	ARCADIS	\$	6,964.94	8/21/2012	5014242602	458047	2012	4100121736	9/12/2012	
4900002839	ARCADIS	\$	4,361.30	8/21/2012	5014242602	458047	2012	4100121737	9/13/2012	
4900002839	ARCADIS	\$	13,657.00	8/21/2012	5014242602	458047	2012	4100121738	9/14/2012	
4900002839	ARCADIS	\$	135.00	8/21/2012	5014242602	458047	2012	4100121739	9/15/2012	
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	34,075.00	7/1/2016	5701810069	5	2016	4100379953	8/22/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	5,373.00	7/1/2016	5701810069	5	2016	4100379953	8/23/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	10,000.00	7/1/2016	5701810069	5	2016	4100379953	8/24/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	25,725.00	7/1/2016	5701810069	5	2016	4100379953	8/25/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	10,580.00	7/1/2016	5701810069	5	2016	4100379953	8/26/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	9,000.00	7/1/2016	5701810069	5	2016	4100379953	8/27/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	6,740.00	7/1/2016	5701810069	5	2016	4100379953	8/28/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	78,050.00	7/1/2016	5701810069	5	2016	4100379953	8/29/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	33,575.00	7/1/2016	5701810069	5	2016	4100379953	8/30/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	33,575.00	7/1/2016	5701810069	5	2016	4100379953	8/31/2016	payment pending
										Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	15,948.96	7/1/2016	5701810069	5	2016	4100379953	9/1/2016	payment pending
			·							Retainage \$31,709.20
4900010523	CAMPANELLA AND SONS INC	\$	16,850.00	7/1/2016	5701810069	5	2016	4100379953	9/2/2016	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	34,075.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
			,							payment pending
4900010523	CAMPANELLA AND SONS INC	\$	597.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		'								payment pending
4900010523	CAMPANELLA AND SONS INC	\$	33,575.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		1	·							payment pending
4900010523	CAMPANELLA AND SONS INC	\$	9,970.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
	· · · · ·	1 '	,	, , >==		-			, ,	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	3,470.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04

4900010523	CAMPANELLA AND SONS INC	\$	5,000.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		'	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	-, ,		-			-, ,	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	23,563.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		'	,	, ,						payment pending
4900010523	CAMPANELLA AND SONS INC	\$	24,500.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		'	,	-, ,					-, ,	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	51,765.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		*	5 = 7. 55.55	_5,,		-			, _ ,	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	23,045.40	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
		*		_5,,		-			, _ ,	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	37,600.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
.5000_00_0		*	0.7,000.00	_0,,		·				payment pending
4900010523	CAMPANELLA AND SONS INC	\$	18,150.00	10/12/2016	5701920680	6	2016	4100389603	10/24/2016	Retainage \$26,531.04
1300010323	6, 1111, 7 11 12 12 17 11 12 00 11 0 11 10		10,130.00	10, 12, 2010	3,0132000	v	2010	120000000	10/2 1/2010	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	15,363.60	9/21/2016	5701903150	8	2016	4100392845	11/8/2016	payment pending
1300010323	C/1011 / 10222 (/ 102 3013 110	-	13,303.00	3/21/2010	3701303130		2010	1100332013	11/0/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	11,013.00	9/21/2016	5701903150	8	2016	4100392845	11/9/2016	payment pending
1300010323	e, , 2 2 3 3 1 1 2	-	11,013.00	3/21/2010	3701303130		2010	1200032013	11/3/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	20,000.00	9/21/2016	5701903150	8	2016	4100392845	11/10/2016	payment pending
4300010323	CANTAINEED TAINE SONS INC	7	20,000.00	3/21/2010	3701303130	<u> </u>	2010	4100332043	11/10/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	13,270.00	9/21/2016	5701903150	8	2016	4100392845	11/11/2016	payment pending
+300010323	C/1011 /110222 (/1102 30113 1110	7	13,270.00	3/21/2010	3701303130	0	2010	1100332013	11/11/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	14,170.00	9/21/2016	5701903150	8	2016	4100392845	11/12/2016	payment pending
+300010323	CAUTA AUGUSTAND SONS INC	7	14,170.00	3/21/2010	3701303130	0	2010	4100332043	11/12/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	28,610.00	9/21/2016	5701903150	8	2016	4100392845	11/13/2016	payment pending
+300010323	CAUTA AUGUSTAND SONS INC	+	20,010.00	3/21/2010	3701303130	<u> </u>	2010	4100332043	11/13/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	42,125.00	9/21/2016	5701903150	8	2016	4100392845	11/14/2016	payment pending
+300010323	CANTAINEED TAINE SONS INC	7	+2,123.00	3/21/2010	3701303130	<u> </u>	2010	4100332043	11/14/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	13,195.00	9/21/2016	5701903150	8	2016	4100392845	11/15/2016	payment pending
1300010323	C/1011 / 10222 (/ 102 3013 110	-	13,133.00	3/21/2010	3701303130		2010	1100332013	11/13/2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	140,800.00	9/21/2016	5701903150	8	2016	4100392845	11/16/2016	payment pending
1300010323		+	110,000.00	3,21,2010	3701303130	-	2010			Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	46,415.00	9/21/2016	5701903150	8	2016	4100392845	11/17/2016	payment pending
1300010323	er with range at the second line	+	10,123.00	3,21,2010	3701303130	-	2010	1200332013	11/1//2010	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	5,690.00	9/21/2016	5701903150	8	2016	4100392845	11/18/2016	payment pending
1300010323		+	3,030.00	3,21,2010	3701303130	-	2010			Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	5,690.00	9/21/2016	5701903150	8	2016	4100392845	11/19/2016	payment pending
	<u> </u>	Ť	3,000.00	3/ ==/ ===	070200200					Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	9,970.00	9/21/2016	5701903150	8	2016	4100392845	11/20/2016	payment pending
		1	2,2.3.33	-,,	2.32003200			122222010	,,	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	85,750.00	9/21/2016	5701903150	8	2016	4100392845	11/21/2016	payment pending
22232000		1	22,123.23	-,,	2122333	<u> </u>			,_,_,_	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	7,735.00	9/21/2016	5701903150	8	2016	4100392845	11/22/2016	payment pending
		†	1,7.23.00	-,,	2.32003400	-		122222313	,,	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	23,140.00	9/21/2016	5701903150	8	2016	4100392845	11/23/2016	payment pending
.500010525	5	۲ ۲	23,170.00	3/21/2010	3,01303130	<u> </u>		.100032013	11, 20, 2010	Lealment benamb

										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	22,500.60	9/21/2016	5701903150	8	2016	4100392845	11/24/2016	payment pending
			,	· ·					· ·	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	215,180.00	9/21/2016	5701903150	8	2016	4100392845	11/25/2016	payment pending
.500010010		T		3/ ==/ ===	0.01000100					Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	95,882.50	9/21/2016	5701903150	8	2016	4100392845	11/26/2016	payment pending
4300010323	CAIVII AIVELEA AIVO SONS IIVE		33,002.30	3/21/2010	3701303130	<u> </u>	2010	4100332043	11/20/2010	Retainage \$83,299.97
4000010533	CAMPANELLA AND SONS INC	\$	29,538.00	10/11/2016	5701903150	8	2016	4100392845	11/27/2016	_
4900010323	CAIVIPANELLA AND 30N3 INC	٦	29,338.00	10/11/2010	3701903130	0	2010	4100392043	11/2//2010	payment pending
4000040533	CANADANIELLA AND CONCINC	_	00 111 1 10	40/44/2046	5704002450	0	2046	44.00202045	44/20/2046	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	98,114.10	10/11/2016	5701903150	8	2016	4100392845	11/28/2016	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	41,029.80	10/11/2016	5701903150	8	2016	4100392845	11/29/2016	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	322,770.00	10/11/2016	5701903150	8	2016	4100392845	11/30/2016	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	159,645.00	10/11/2016	5701903150	8	2016	4100392845	12/1/2016	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	24,420.00	10/11/2016	5701903150	8	2016	4100392845	12/2/2016	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	13,270.00	10/11/2016	5701903150	8	2016	4100392845	12/3/2016	payment pending
										Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	14,170.00	10/11/2016	5701903150	8	2016	4100392845	12/4/2016	payment pending
			,						· ·	Retainage \$83,299.97
4900010523	CAMPANELLA AND SONS INC	\$	28,610.00	10/11/2016	5701903150	8	2016	4100392845	12/5/2016	payment pending
	CAMPANELLA AND SONS INC	\$	28,610.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
				,,		-			, . ,	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	29,538.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
.500010323	o, will y a veed a veed a veed		23,330.00	11, 20, 2010	370132 1303	J		1100037311	12,7,2010	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	13,270.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
4500010525	CAIVII AIVELLA AIVO 30113 IIVC		13,270.00	11/20/2010	3701324303	3	2010	4100337344	12/7/2010	payment pending
4900010522	CAMPANELLA AND SONS INC	\$	14,170.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
4900010323	CAIVIFAINELLA AIND 30113 INC	۲	14,170.00	11/20/2010	3701324383	9	2010	4100397344	12///2010	payment pending
4000010533	CAMPANELLA AND SONS INC	۲	00 114 10	11/20/2016	F70102420F	0	2016	4100207244	12/7/2016	· · · · ·
4900010523	CAIVIPANELLA AND SONS INC	\$	98,114.10	11/28/2016	5701924385	9	2016	4100397344	12///2016	Retainage \$75,741.69
4000040533	CAAADANEU A AND CONCINC		44.020.00	44/20/2046	5704024205		2046	4400207244	42/7/2046	payment pending
4900010523	CAMPANELLA AND SONS INC	\$	41,029.80	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
										payment pending
4900010523	CAMPANELLA AND SONS INC	\$	25,850.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
										payment pending
4900010523	CAMPANELLA AND SONS INC	\$	322,770.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
										payment pending
4900010523	CAMPANELLA AND SONS INC	\$	159,645.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
										payment pending
4900010523	CAMPANELLA AND SONS INC	\$	24,420.00	11/28/2016	5701924385	9	2016	4100397344	12/7/2016	Retainage \$75,741.69
										payment pending
										Retainage \$122,062.03
4900010523	CAMPANELLA AND SONS INC	\$	25,606.00	12/20/2016	5702004640	10	2016	4100407413	2/7/2017	payment pending

										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	57,290.00	12/20/2016	5702004640	10	2016	4100407413	2/8/2017	payment pending
		† ·	,	· ·						Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	42,048.90	12/20/2016	5702004640	10	2016	4100407413	2/9/2017	payment pending
		† ·	,	· ·					· ·	Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	17,584.20	12/20/2016	5702004640	10	2016	4100407413	2/10/2017	payment pending
			·							Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	39,009.00	12/20/2016	5702004640	10	2016	4100407413	2/11/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	15,870.00	12/20/2016	5702004640	10	2016	4100407413	2/12/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	10,000.00	12/20/2016	5702004640	10	2016	4100407413	2/13/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	10,447.00	12/20/2016	5702004640	10	2016	4100407413	2/14/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	6,970.00	12/20/2016	5702004640	10	2016	4100407413	2/15/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	10,000.00	12/20/2016	5702004640	10	2016	4100407413	2/16/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	8,425.00	12/20/2016	5702004640	10	2016	4100407413	2/17/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	49,000.00	12/20/2016	5702004640	10	2016	4100407413	2/18/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	2,499.41	12/20/2016	5702004640	10	2016	4100407413	2/19/2017	payment pending
										Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	537,950.00	12/20/2016	5702004640	10	2016	4100407413	2/20/2017	payment pending
		١.								Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	181,730.77	12/20/2016	5702004640	10	2016	4100407413	2/21/2017	payment pending
									0 100 100 10	Retainage \$122,062.03
4900010523 C	CAMPANELLA AND SONS INC	\$	51,802.50	12/20/2016	5702004640	10	2016	4100407413	2/22/2017	payment pending
	SANADANISH A AND SONS INC		446.007.70	10/00/0016		40	2215	4400407440	2/22/2017	Retainage \$122,062.03
	CAMPANELLA AND SONS INC	\$	116,987.50	12/20/2016	5702004640	10	2016	4100407413	2/23/2017	payment pending
	CAMPANELLA AND SONS INC	\$	29,954.61	6/10/2015	5701389263	8523	2015	4100398814	12/19/2016	
	CAMPANELLA AND SONS INC	\$	4,250.00	6/10/2015	5701389263	8523	2015	4100398814	12/20/2016	
	CAMPANELLA AND SONS INC	\$	12,180.00	6/10/2015	5701389263	8523	2015	4100398814	12/21/2016	
	CAMPANELLA AND SONS INC	\$	7,040.00	6/10/2015	5701389263	8523	2015	4100398814	12/22/2016	
-	CAMPANELLA AND SONS INC	\$	11,885.00	6/10/2015	5701389263	8523 9502	2015	4100398814	12/23/2016	
	CAMPANELLA AND SONS INC CAMPANELLA AND SONS INC	\$	14,142.23	9/18/2015	5701502878	8592 9502	2015	4100335273 4100335273	11/23/2014 11/24/2014	
	CAMPANELLA AND SONS INC	\$	9,125.00 7,380.00	9/18/2015 9/18/2015	5701502878 5701502878	8592 8592	2015 2015	4100335273	11/25/2014	
	CAMPANELLA AND SONS INC	\$	1,680.00	9/18/2015	5701502878	8592 8592	2015	4100335273	11/26/2014	
-	CAMPANELLA AND SONS INC	\$	5,170.00	9/18/2015	5701502878	8592 8592	2015	4100335273	11/27/2014	
	CAMPANELLA AND SONS INC	\$	9,292.50	9/18/2015	5701502878	8592 8592	2015	4100335273	11/28/2014	
-	CAMPANELLA AND SONS INC	\$	20,801.52	10/26/2015	5701502878	8616	2015	4100333273	12/16/2015	
	CAMPANELLA AND SONS INC	\$	4,750.00	10/26/2015	5701542628	8616	2015	4100339302	12/17/2015	
	CAMPANELLA AND SONS INC	\$	5,022.50	10/26/2015	5701542628	8616	2015	4100339302	12/18/2015	
	CAMPANELLA AND SONS INC	\$	27,405.00	10/26/2015	5701542628	8616	2015	4100339302	12/19/2015	
4300007710 C	AIVII AIVELLA AIVO JOINJ INC	٦	27,403.00	10/20/2013	3/01342020	0010	2013	4100333307	12/13/2013	1

4900007716	CAMPANELLA AND SONS INC	\$	34,972.50	10/26/2015	5701542628	8616	2015	4100339302	12/20/2015	
	CAMPANELLA AND SONS INC	\$	17,887.50	10/26/2015	5701542628	8616	2015	4100339302	12/21/2015	
1300007710	CANALAGE CAMP SOLIS INC	7	17,007.50	10/20/2013	3701312020		2013	4100352843;	3/14/2016;	
4900007716	CAMPANELLA AND SONS INC	\$	84,194.11	2/3/2016	5701646607	8643	2016	4100392843,	12/19/2016	Retainage paid out
4300007710	CAIVII AIVEELA AIVE SOIVS IIVC	7	04,134.11	2/3/2010	3701040007	8043	2010	4100352843;	3/14/2016;	Retainage paid out
4900007716	CAMPANELLA AND SONS INC	\$	75,762.50	2/3/2016	5701646607	8643	2016	4100398815	12/19/2017	Retainage paid out
4900007716	CAMPANELLA AND SONS INC	Ş	73,762.30	2/3/2010	3701040007	0043	2010	4100398813	3/14/2016;	Retainage paid out
4000007746	CANADANIELI A AND CONCUNC	,	66 074 44	2/2/2016	F704 C4CC07	0.042	2016			Datainana maid ant
4900007716	CAMPANELLA AND SONS INC	\$	66,071.44	2/3/2016	5701646607	8643	2016	4100398816	12/19/2018	Retainage paid out
				0 10 10 0 1 5		0.040	2215	4100352843;	3/14/2016;	
490000//16	CAMPANELLA AND SONS INC	\$	55,335.00	2/3/2016	5701646607	8643	2016	4100398817	12/19/2019	Retainage paid out
								4100352843;	3/14/2016;	
4900007716	CAMPANELLA AND SONS INC	\$	18,817.50	2/3/2016	5701646607	8643	2016	4100398818	12/19/2020	Retainage paid out
								4100352843;	3/14/2016;	
4900007716	CAMPANELLA AND SONS INC	\$	31,352.70	2/3/2016	5701646607	8643	2016	4100398819	12/19/2021	Retainage paid out
4900007716	CAMPANELLA AND SONS INC	\$	6,659.31	7/1/2016	5701811145	8721	2016	4100380282	8/22/2016	
4900007716	CAMPANELLA AND SONS INC	\$	73,426.06	7/1/2016	5701811145	8721	2016	4100380283	8/22/2016	
4900007716	CAMPANELLA AND SONS INC	\$	40,993.54	7/1/2016	5701811145	8721	2016	4100380284	8/22/2016	
										Retainage \$4,292.91
4900012586	CAMPANELLA AND SONS INC	\$	22,929.06	7/1/2016	5701811146	8733	2016	4100380282	8/22/2016	payment pending
									· · ·	Retainage \$4,292.91
4900012586	CAMPANELLA AND SONS INC	\$	20,000.00	7/1/2016	5701811146	8733	2016	4100380283	8/22/2016	payment pending
		т		- 7 - 7 5 - 5			1		-, ,	Retainage \$30,799.89
4900012586	CAMPANELLA AND SONS INC	\$	52,652.23	8/8/2016	5047187083	8752	2016	4100386445	10/3/2016	payment pending
1300012300	o, , ,	· ·	32,032.23	0,0,2010	3017207003	0,32	1010	1200000110	10/0/2010	Retainage \$30,799.89
4900012586	CAMPANELLA AND SONS INC	\$	30,886.87	8/8/2016	5047187083	8752	2016	4100386446	10/3/2016	payment pending
4500012500	CANALLA CALLACTURE SOLVE LIVE	7	30,000.07	0/0/2010	3047107003	0732	2010	4100300440	10/3/2010	Retainage \$30,799.89
4000012596	CAMPANELLA AND SONS INC	\$	136,064.00	8/8/2016	5047187083	8752	2016	4100386447	10/3/2016	payment pending
4900012380	CAIVIPANELLA AND 30N3 INC	٦	130,004.00	0/0/2010	3047167063	0/32	2010	4100360447	10/3/2010	
4000043506	CANADANIELLA AND CONCINIC	,	40 420 56	0/0/2016	F047407002	0752	2016	4100206440	10/2/2016	Retainage \$30,799.89
4900012586	CAMPANELLA AND SONS INC	\$	49,138.56	8/8/2016	5047187083	8752	2016	4100386448	10/3/2016	payment pending
4000040506		_	22.057.20	0/0/2016	5047407000	0750	2046	44,000,000,440	10/0/0016	Retainage \$30,799.89
	CAMPANELLA AND SONS INC	\$	39,057.29	8/8/2016	5047187083	8752	2016	4100386449	10/3/2016	payment pending
	CAMPANELLA AND SONS INC	\$	19,986.38	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
	CAMPANELLA AND SONS INC	\$	33,655.80	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
	CAMPANELLA AND SONS INC	\$	39,680.00	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
	CAMPANELLA AND SONS INC	\$	3,500.00	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
	CAMPANELLA AND SONS INC	\$	12,026.07	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
4900012843	CAMPANELLA AND SONS INC	\$	32,230.50	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
4900012843	CAMPANELLA AND SONS INC	\$	19,300.00	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
4900012843	CAMPANELLA AND SONS INC	\$	19,280.45	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
4900012843	CAMPANELLA AND SONS INC	\$	2,530.00	8/8/2016	5701852260	8753	2016	4100386445	10/3/2016	
										Retainage \$5,635.32
4900012586	CAMPANELLA AND SONS INC	\$	9,037.77	9/21/2016	5048301551	8785	2016	4100392845	11/8/2016	payment pending
				- ·					· ·	Retainage \$5,635.32
4900012586	CAMPANELLA AND SONS INC	\$	7,964.07	9/21/2016	5048301551	8785	2016	4100392846	11/8/2016	payment pending
1555512550			.,	0,, 2010	33.3301331	2.00		12000010	, _, _,	Retainage \$5,635.32
4900012586	CAMPANELLA AND SONS INC	\$	9,719.44	9/21/2016	5048301551	8785	2016	4100392847	11/8/2016	payment pending
+30001Z300	OUT THE LET AND SOUS INC	ې	J,1 13.44	2/ 21/ 2010	2040201221	0703	2010	7100332047	11/0/2010	Ipayment penang

									Retainage \$5,635.32
4900012586	CAMPANELLA AND SONS INC	\$ 19,231.96	9/21/2016	5048301551	8785	2016	4100392848	11/8/2016	payment pending
									Retainage \$5,635.32
4900012586	CAMPANELLA AND SONS INC	\$ 10,400.00	9/21/2016	5048301551	8785	2016	4100392849	11/8/2016	payment pending
4900012843	CAMPANELLA AND SONS INC	\$ 34,769.55	9/21/2016	5701903152	8786	2016	4100392845	11/8/2016	
4900012843	CAMPANELLA AND SONS INC	\$ 227,673.93	9/21/2016	5701903152	8786	2016	4100392846	11/8/2016	
4900012843	CAMPANELLA AND SONS INC	\$ 87,619.50	9/21/2016	5701903152	8786	2016	4100392847	11/8/2016	
4900012843	CAMPANELLA AND SONS INC	\$ 20,048.86	9/21/2016	5701903152	8786	2016	4100392848	11/8/2016	
4900012843	CAMPANELLA AND SONS INC	\$ 82,070.00	9/21/2016	5701903152	8786	2016	4100392849	11/8/2016	
4900012843	CAMPANELLA AND SONS INC	\$ 53,472.75	10/11/2016	5701924384	8880	2016	4100396791	12/1/2016	
4900007323	CLEAN CUT TREE SERVICE	\$ 4,500.00	7/1/2015	5701412752	10249	2015	4100314874	8/6/2015	
4900005654	DAVID M PETERSON PE PC	\$ 3,840.00	3/17/2015	5701316289	994	2015	2000426402	3/17/2015	ACH
4900005654	DAVID M PETERSON PE PC	\$ 14,450.00	3/17/2015	5701316289	994	2015	2000426402	3/17/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 3,500.00	3/17/2015	5701316289	994	2015	2000426402	3/17/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 5,700.00	3/17/2015	5701316289	994	2015	2000426402	3/17/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 3,500.00	4/20/2015	5701346478	1000	2015	2000434084	4/20/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 12,850.00	4/20/2015	5701346478	1000	2015	2000434085	4/20/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 15,000.00	4/20/2015	5701346478	1000	2015	2000434086	4/20/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 4,800.00	4/20/2015	5701346478	1000	2015	2000434087	4/20/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 900.00	4/20/2015	5701346478	1000	2015	2000434088	4/20/2015	ACH
900005654	DAVID M PETERSON PE PC	\$ 4,900.00	4/20/2015	5701346478	1000	2015	2000434089	4/20/2015	ACH
900005654	DAVID M PETERSON PE PC	\$ 960.00	4/20/2015	5701346478	1000	2015	2000434090	4/20/2015	ACH
900005654	DAVID M PETERSON PE PC	\$ 6,100.00	6/2/2015	5701388843	1007	2015	2000444259	7/15/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 13,500.00	6/2/2015	5701388843	1007	2015	2000444260	7/15/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 23,950.00	6/2/2015	5701388843	1007	2015	2000444261	7/15/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 35,290.00	7/6/2015	5701422397	1021	2015	2000452053	8/10/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 9,990.00	8/4/2015	5701453381	1022	2015	2000459076	9/18/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 4,750.00	8/4/2015	5701453381	1022	2015	2000459077	9/18/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 5,340.00	8/4/2015	5701453381	1022	2015	2000459078	9/18/2015	ACH
1900005654	DAVID M PETERSON PE PC	\$ 7,500.00	8/4/2015	5701453381	1022	2015	2000459079	9/18/2015	ACH
1900010488	DAVID M PETERSON PE PC	\$ 480.00	9/3/2015	5701487079	1027	2015	2000465823	9/3/2015	ACH
	DAVID M PETERSON PE PC	\$ 19,000.00	9/3/2015	5701487079	1027	2015	2000465824	9/3/2015	ACH
1900010488	DAVID M PETERSON PE PC	\$ 25,500.00	9/3/2015	5701487079	1027	2015	2000465825	9/3/2015	ACH
	DAVID M PETERSON PE PC	\$ 7,000.00	9/3/2015	5701487079	1027	2015	2000465826	9/3/2015	ACH
	DAVID M PETERSON PE PC	\$ 3,000.00	9/3/2015	5701487079	1027	2015	2000465827	9/3/2015	ACH
	DAVID M PETERSON PE PC	\$ 3,360.00	9/3/2015	5701487079	1027	2015	2000465828	9/3/2015	ACH
	DAVID M PETERSON PE PC	\$ 8,400.00	10/6/2015	5701520563	1031	2015	2000474227	11/20/2015	ACH
	DAVID M PETERSON PE PC	\$ 45,600.00	10/6/2015	5701520563	1031	2015	2000474228	11/20/2015	ACH
	DAVID M PETERSON PE PC	\$ 36,000.00	10/6/2015	5701520563	1031	2015	2000474229	11/20/2015	ACH
	DAVID M PETERSON PE PC	\$ (38,000.00)	7/13/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ 38,000.00	3/8/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ (30,000.00)	7/13/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ (7,000.00)	7/13/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ 30,000.00	7/14/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ 7,000.00	7/14/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ 30,000.00	3/8/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
	DAVID M PETERSON PE PC	\$ 7,000.00	3/8/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH

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4900010488 DAVID M PETERSON PE PC	\$ (7,000.00)	7/12/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ 38,000.00	7/14/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ (38,000.00)	7/12/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ (30,000.00)	7/12/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ 38,000.00	2/18/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ 30,000.00	2/18/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ 7,000.00	2/18/2016	5701667212	1036	2016	2000502177	12/17/2015	ACH
4900010488 DAVID M PETERSON PE PC	\$ 34,200.00	12/2/2015	5701581824	1040	2015	2000486622	1/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 27,000.00	12/2/2015	5701581824	1040	2015	2000486623	1/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 6,300.00	12/2/2015	5701581824	1040	2015	2000486624	1/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 30,360.00	1/4/2016	5701615250	1044	2016	2000494060	2/18/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 31,500.00	1/4/2016	5701615250	1044	2016	2000494060	2/18/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 5,250.00	1/4/2016	5701615250	1044	2016	2000494060	2/18/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 6,300.00	2/1/2016	5701644570	1048	2016	2000500720	3/17/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 360.00	4/11/2016	5701044370	1060	2016	2000516531	4/5/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 9,040.00	4/11/2016	5701711809	1060	2016	2000516531	4/5/2016	ACH
4900010488 DAVID M PETERSON PE PC 4900010488 DAVID M PETERSON PE PC	\$ 9,040.00	7/14/2016	5701711809	1071	2016	2000516531	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 13,300.00	7/13/2016	5701741686	1071	2016	2000522897	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (13,300.00)	7/13/2016	5701741686	1071	2016	2000522898	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (17,500.00)	7/13/2016	5701741686	1071	2016	2000522899	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 13,300.00	7/14/2016	5701741686	1071	2016	2000522900	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 17,500.00	7/14/2016	5701741686	1071	2016	2000522901	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 17,500.00	7/13/2016	5701741686	1071	2016	2000522902	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (17,500.00)	7/14/2016	5701741686	1071	2016	2000522903	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 13,300.00	5/2/2016	5701741686	1071	2016	2000522904	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 17,500.00	5/2/2016	5701741686	1071	2016	2000522905	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 3,960.00	5/2/2016	5701741686	1071	2016	2000522906	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 600.00	5/2/2016	5701741686	1071	2016	2000522907	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 1,440.00	5/2/2016	5701741686	1071	2016	2000522908	5/2/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 24,420.00	6/1/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 12,500.00	6/1/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 2,000.00	6/1/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (24,420.00)	7/13/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (12,500.00)	7/13/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (2,000.00)	7/13/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (24,420.00)	7/14/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 12,500.00	7/13/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 2,000.00	7/13/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (12,500.00)	7/14/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (2,000.00)	7/14/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 24,420.00	7/13/2016	5701775930	1080	2016	2000539608	7/16/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 37,680.00	7/13/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 42,000.00	7/13/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ 9,100.00	7/13/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
4900010488 DAVID M PETERSON PE PC	\$ (37,680.00)	7/13/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
4900010488 DAVID M PETERSON PE PC		7/14/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
								+
4900010488 DAVID M PETERSON PE PC	\$ (9,100.00)	7/14/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH

		\$ 1	1,329,462.39							
4900013273	DISTRICT	\$	575.36	8/16/2016	5047396007	MISC00000106541	2016	4100389091	10/16/2016	
	NORTH SHORE WATER RECLAMATION									
4900013273	DISTRICT	\$	575.36	8/11/2016	5047261575	MISC00000106541	2016	4100389091	10/19/2016	
	NORTH SHORE WATER RECLAMATION									
4900013273	NORTH SHORE SANITARY DISTRICT	\$	9,292.76	9/7/2016	5047956585	106742	2016	4100389091	10/19/2016	
4900013273	NORTH SHORE SANITARY DISTRICT	\$	10,898.20	7/27/2016	5046882157	MISC00000106232	2016	4100377829	8/29/2016	
4900010064	NORTH SHORE GAS	\$	133,000.00	5/5/2016	5701746151	WAUKEGAN0516	2016	4100363628	5/23/2016	
4900005664	DAVID M PETERSON PE PC	\$	1,674.96	3/17/2015	5701316119	1640	2015	2000426402	5/1/2015	ACH
4900010488	DAVID M PETERSON PE PC	\$	7,000.00	1/3/2017	5702015346	1129	2017	2000579670	1/3/2017	ACH
4900010488	DAVID M PETERSON PE PC	\$	62,750.00	12/6/2016	5701987054	1122	2016	2000573504	12/6/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	68,150.00	11/1/2016	5701949117	1114	2016	2000565593	11/1/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	41,700.00	10/6/2016	5701920246	1105	2016	2000559111	10/19/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	24,600.00	10/6/2016	5701920246	1105	2016	2000559111	10/19/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	(42,500.00)	10/6/2016	5048669731	1098	2016	2000552466	9/7/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	127,500.00	9/7/2016	5047950140	1098	2016	2000552466	9/7/2016	ACH
	DAVID M PETERSON PE PC	\$	31,570.00	8/2/2016	5701846006	1095	2016	2000544430	9/16/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	4,200.00	8/2/2016	5701846006	1095	2016	2000544430	9/16/2016	ACH
	DAVID M PETERSON PE PC	\$	17,400.00	8/2/2016	5701846006	1095	2016	2000544430	9/16/2016	ACH
	DAVID M PETERSON PE PC	\$	12,000.00	7/20/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
	DAVID M PETERSON PE PC	\$	30,000.00	7/20/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
	DAVID M PETERSON PE PC	\$	37,680.00	7/20/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH
4900010488	DAVID M PETERSON PE PC	\$	9,100.00	7/20/2016	5701821116	1091	2016	2000539608	8/26/2016	ACH

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Exhibit F Cost Allocation and IDOT Attribution Table

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Exhibit F

Cost Allocation and IDOT Attribution Table

	Task Bucket													
Work/Cost Type		Nicor Gas			Waukegan Water I	Line		AT&T			ComEd			
			Site 3 and		-	Site 3 and			Site 3 and			Site 3 and		
	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6		
Professional Engineering Services - LFR/Arcadis/AECOM	\$ 106,086		\$ -	\$ 35,867	\$ 48,433 \$	-	\$ 26,524 \$	31,105 \$		\$ -	7	\$ -		
Percentage Attribution to IDOT	0%		_	100%	0%	0%	66.0%	33.0%	0%	0%	0%	0%		
IDOT Attribution	\$ -	\$ -	\$ -	\$ 35,867	\$ - \$	-	\$ 17,506 \$	10,265 \$	-	\$ -	\$ -	\$ -		
Professional Engineering Services - Completion Costs - AECOM Estimate	\$ -	\$ -	s -	¢ .	\$ - \$	_	s - s	15,000 \$		Ś -	\$ -	\$ -		
Percentage Attribution to IDOT	0%		T	0%	0%	0%	0.0%	0%	0%	0%	0%	0%		
DOT Attribution	\$ -	s -	Ś -	\$ -	s - s	-	s - s	- s		ė -	\$ -	ė -		
DOT Attribution	, -	-	, -	, -		-	, - <u>,</u>	- ,		· -	, -	· -		
Operations and Maintenance - AECOM Estimate	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ - \$	- Ś	-	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	0%			0%	0%	0%	0%	0%	0%	0%	0%	0%		
IDOT Attribution	\$ -	s -	\$ -	\$ -	s - s	-	s - s	- s		\$ -	\$ -	\$ -		
	ľ			i i		1		Ť						
Construction Services - Campanella Base Bid	\$ 106,848	\$ -	\$ -	\$ 25,170	\$ - \$	-	\$ - \$	- \$	-	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%		
IDOT Attribution	Ś -	\$ -	\$ -	\$ 25,170	\$ - \$	-	\$ - \$	- Ś	-	\$ -	\$ -	\$ -		
	ľ													
Construction Services - Campanella T&M Services	\$ 5,156	\$ -	\$ -	\$ -	\$ 38,241 \$	-	\$ - \$	- \$	53,548	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	0%	0%	0%	0%	0%	40.9%	0%	0%	0%		
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ - \$	- \$	21,901	\$ -	\$ -	\$ -		
Construction Services - DMP	\$ -		\$ 360		\$ - \$	-	\$ - \$	- \$	45,350	\$ -		\$ -		
Percentage Attribution to IDOT	0%	0%	0%	0%	0%	0%	0%	0%	40.9%	0%	0%	0%		
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ - \$	- \$	18,548	\$ -	\$ -	\$ -		
Construction Services - Miscellaneous			\$ -	\$ -	\$ - \$	-	\$ - \$	-		\$ -		\$ -		
Percentage Attribution to IDOT	0%			0%	0%	0%	0%	0%	0%	0%	0%	0%		
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ - \$	- \$	-	\$ -	\$ -	\$ -		
	ļ													
Construction Services - Payments to Utilities			\$ -	Ÿ	\$ - \$	-	\$ 82,127 \$	238,161		\$ -		\$ -		
Percentage Attribution to IDOT	0%			0%	0%	0%	66.0%	33.0%	0%	0%	0%	. 0%		
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ 54,204 \$	78,593 \$	-	\$ -	\$ -	\$ -		
Easement Legal Support - Manikas	Ś -	\$ -	s -	ė	\$ - \$		s - s	- Ś		\$ -	\$ -	ć		
Easement Legal Support - Manikas Percentage Attribution to IDOT	0%		*	\$ - 0%	5 - 5	0%	5 - 5	- 5	0%	s - 0%	0%	> - 0%		
Percentage Attribution to IDO1	\$ -		\$ -	\$ -	\$ - \$	-	\$ - \$	- \$		\$ -		ć 0%		
DOT ALTIDULION	, -	- د	- پ	- پ	· .		·	- \$	-		- ب	, -		
PA Oversight	\$ -	\$ -	\$ -	\$ -	\$ - \$	- 1	\$ - \$	- S	-	\$ -	\$ -	\$ -		
Percent Attribution to IDOT	0%			0%	0%	0%	0%	0%	0%	0%	0%	0%		
DOT Attribution	\$ -	s -	\$ -	\$ -	s - s	- 1	\$ - \$	- s	- 1	\$ -	\$ -	\$ -		
	1					1								
otal Costs	\$ 218,090	\$ -	\$ 360	\$ 61,037	\$ 86,674 \$	-	\$ 108,651 \$	284,266 \$	98,898	\$ -	\$ -	\$ -		
	,,,,,						.		• • •					
otal IDOT Attribution	\$ -	\$ -	\$ -	\$ 61,037	\$ - \$	-	\$ 71,710 \$	88,858 \$	40,449	\$ -	\$ -	\$ -		

 AT&T
 \$ 392,918

 Total AT&T Site 3 and Site 6
 \$ 160,568

 IDOT Attribution
 \$ 160,568

Percent IDOT attribution 40.9%
AT&T IDOT Total \$ 201,017

ElectEleartronfiid Friling Received, Cleck's 'Office it 10/12/013/2019

Exhibit F

Cost Allocation and IDOT Attribution Table

							Task E	Bucket					
Work/Cost Type	Utility/Asb		aining Mat	terial (ACM)	No	rth Shore Gas (N	SG)		Dewatering		North	neast (NE) Excav	ration
		LACG	vacion	Site 3 and	- 110	Till Shore Gas (N	Site 3 and	'	bewatering.	Site 3 and	140111	least (NE) Exeat	Site 3 and
	Site 3	Si	te 6	Site 6	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6
Professional Engineering Services - LFR/Arcadis/AECOM	7	- \$	- \$	-	\$ 135,159			\$ - \$	-	\$ -	\$ 3,977		\$ -
Percentage Attribution to IDOT		0%	0%	0%	100.09		0%	0%	0%		100.0%	0%	0%
IDOT Attribution	\$	- \$	- \$	-	\$ 135,159	\$ 22,631	\$ -	\$ - \$	-	\$ -	\$ 3,977	\$ -	\$ -
Professional Engineering Services - Completion Costs - AECOM Estimate	\$	- \$	- \$	-	\$ -	\$ -	\$ -	\$ - \$	-	\$ -	\$ 10,000	\$ -	\$ -
Percentage Attribution to IDOT		0%	0%	0%	09	0%	0%	0%	0%	0%	100.0%	0%	0%
DOT Attribution	\$	- \$	- \$	-	\$ -	\$ -	\$ -	\$ - \$		\$ -	\$ 10,000	\$ -	\$ -
Operations and Maintenance - AECOM Estimate	*	- \$	- \$	-	\$ -	7	\$ -	\$ - \$		\$ -	\$ -	\$ -	\$ -
Percentage Attribution to IDOT		0%	0%	0%	09	0%	0%	0%	0%	0%	0%	0%	0%
IDOT Attribution	\$	- \$	- \$	-	\$ -	\$ -	\$ -	\$ - \$	-	\$ -	\$ -	\$ -	\$ -
Construction Services - Campanella Base Bid	ė	- Ś	155,318 \$	_	Ś -		\$ -	\$ 140,800 \$	159,250	ė	\$ 35,957	\$ -	ć
Percentage Attribution to IDOT	*	0%	50.0%	0%	09		- 0%	75.0%	50.0%	-	\$ 35,957 100.0%	5 - 0%	0%
Percentage Attribution to IDO1		- 5	77,659 \$	U%	υ ₇	\$ -	ć	\$ 105,600 \$	79,625		\$ 35,957	\$ -	\$ -
DOT Attribution	3	- 3	77,039 3	-	· -	ş -	, -	\$ 105,600 \$	79,023	· -	\$ 33,937	ş -	· -
Construction Services - Campanella T&M Services	\$	- \$	- \$	-	\$ 162,678	\$ -	\$ 22,327	\$ 24,325 \$	-	\$ 17,675	\$ -	\$ -	\$ -
Percentage Attribution to IDOT		0%	0%	0%	100.09	0.0%	70.2%	75.0%	0.0%	70.9%	0%	0%	0%
IDOT Attribution	\$	- \$	- \$	-	\$ 162,678	\$ -	\$ 15,674	\$ 18,244 \$	-	\$ 12,532	\$ -	\$ -	\$ -
Construction Services - DMP	ć	- Ś	- Ś		\$ -	\$ -	\$ 35,830	\$ 74,530 \$		\$ 21,500	ć	\$ -	\$ -
Percentage Attribution to IDOT	*	0%	0%	0%	0.09	7	70.2%	100.0%	0.0%		0%	0%	0%
IDOT Attribution		- 5	- 5	070	\$ -	\$ -	\$ 25,153	\$ 74,530 \$	-		\$ -	\$ -	ė .
IDOT Attribution	3	- 7	- 7		,	, -	3 23,133	3 74,330 3		3 13,244	· -	,	-
Construction Services - Miscellaneous	\$	- \$	- \$	-	\$ -	\$ -		\$ - \$	-		\$ -	\$ -	\$ -
Percentage Attribution to IDOT		0%	0%	0%	09	0%		0%	0%		0%	0%	0%
IDOT Attribution	\$	- \$	- \$	-	\$ -	\$ -		\$ - \$	-		\$ -	\$ -	\$ -
Control of the Contro		- Ś	- \$		\$ 34.687	ć 452.022		d 40.430 d	4 227	<u> </u>	<u>,</u>	\$ -	\$ -
Construction Services - Payments to Utilities	Ÿ	7	- Ş 0%	-	\$ 31,007		0.00/	\$ 19,429 \$	1,337		\$ -	~	7
Percentage Attribution to IDOT IDOT Attribution	ć	0%	0%	0%	100.09 \$ 34.687		0.0%	100% \$ 19.429 \$	0%	0.0% \$ -	0%	0% \$ -	9%
DOT AUTBUUT	3	- 3	- 3	-	\$ 54,067	\$ 42,900	, -	\$ 19,429 \$		· -	· -	ş -	, -
Easement Legal Support - Manikas	\$	- \$	- \$	-	\$ -	\$ -	\$ -	\$ - \$	-	\$ -	\$ -	\$ -	\$ -
Percentage Attribution to IDOT	ĺ	0%	0%	0%	09	0%	0%	0%	0%	0%	0%	0%	0%
IDOT Attribution	\$	- \$	- \$	-	\$ -	\$ -	\$ -	\$ - \$	-	\$ -	\$ -	\$ -	\$ -
EDA Ovorsight	6	- \$	- \$		\$ -	\$ -	\$ -	s - s	-	ć	ć	\$ -	\$ -
EPA Oversight	Ÿ	0%	0%	0%	09	7	5 - 0%	5 - 5	0%		\$ - 0%	Ş - 0%	0%
Percent Attribution to IDOT IDOT Attribution		- 5	- 5	U%	ψ,		Ś -	\$ - \$	-		ć - U%	\$ -	\$ -
DOT ALLIBULION	ş	- >	- \$	-	ş -	ş -	,	ş - Ş	-	ş -	ş -	ş -	ş -
Fotal Costs	\$	- \$	155,318 \$	-	\$ 332,524	\$ 234,861	\$ 58,157	\$ 259,084 \$	160,587	\$ 39,175	\$ 49,934	\$ -	\$ -
Fotal IDOT Attribution	s	- s	77,659 \$	_	\$ 332,524	\$ 65,597	\$ 40,826	\$ 217,803 \$	79,625	\$ 27,775	\$ 49,934	s -	s -

North Shore Gas (NSG)		<u>Dewatering</u>		
Total NSG Site 3 and Site 6	\$	567,385 Total dewater Site 3 and Site 6	\$	419,671
IDOT Attribution	\$	398,121 IDOT Attribution	\$	297,428
Percent IDOT attribution		70.2% Percent IDOT attribution		70.9%
NSG IDOT Total	Ś	438.947 Dewatering IDOT Total	Ś	325.203

ElectEleactronfiid Friling Received, Cleck's 'Office it 10/12/01392019

Cost Allocation and IDOT Attribution Table

Exhibit F

	Task Bucket													
Work/Cost Type	Fil	ling and Capping	3	Ramp			General S	ite/Site Prepa	ration	Health and Safety				
			Site 3 and			Site 3 and			Site 3 and			Site 3 and		
	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6	Site 3	Site 6	Site 6		
Professional Engineering Services - LFR/Arcadis/AECOM	\$ -	\$ - !	-	\$ 20,880 \$	- \$	-	\$ 355,534 \$	519,027	\$ -	Ÿ	\$ -	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	100%	0%	0%	74.2%	37.9%	0%	0%		0%		
IDOT Attribution	\$ -	\$ - !	-	\$ 20,880 \$	- \$	-	\$ 263,806 \$	196,711	\$ -	\$ -	\$ -	\$ -		
Professional Engineering Services - Completion Costs - AECOM Estimate	\$ -	\$ - !	-	\$ - \$	- Ś	-	\$ 70,621 \$	53,250	\$ -	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	0%	0%	0%	74.2%	37.9%	. 0%	0%	0%	0%		
DOT Attribution	Ś -	\$ - S	-	\$ - \$	- Ś	-	\$ 52,401 \$	20,182			\$ -	\$ -		
Operations and Maintenance - AECOM Estimate	\$ -	\$ - !		\$ - \$	- \$	-	\$ 310,903 \$		\$ -		Ÿ	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	0%	0%	0%	80.0%	0%	0%	0%	0%	0%		
IDOT Attribution	\$ -	\$ - 5	-	\$ - \$	- \$	-	\$ 248,722 \$	-	\$ -	\$ -	\$ -	\$ -		
Construction Services - Campanella Base Bid	\$ 328,983			\$ - \$	- \$	-	\$ 138,310 \$	95,560			Ψ.	\$ 77,000		
Percentage Attribution to IDOT	80.0%	0%	0%	0%	0%	0%	74.2%	37.9%	. 0%	0%	0%	63.1%		
IDOT Attribution	\$ 263,186	\$ - !	-	\$ - \$	- \$	-	\$ 102,626 \$	36,217	\$ -	\$ -	\$ -	\$ 48,587		
Construction Services - Campanella T&M Services	\$ 41,721	\$ 188,183	231,862	\$ - \$	- Ś	_	\$ - \$	37,410	\$ -	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	80.0%	50.0%	67.4%	0%	0%	0%	0.0%	37.9%	0%	0%		0%		
IDOT Attribution	\$ 33,377	\$ 94,092	156,275	\$ - \$	- \$	-	\$ - \$	14,178	\$ -		\$ -	\$ -		
Construction Services - DMP	\$ 55,550			\$ - \$	- \$		\$ - \$,		Y	\$ -		
Percentage Attribution to IDOT	80.0%	50.0%	67.4%	0%	0%	0%	0%	0%	63.1%	0%		0%		
IDOT Attribution	\$ 44,440	\$ 61,085	80,981	\$ - \$	- \$	-	\$ - \$	-	\$ 46,883	\$ -	\$ -	\$ -		
Construction Services - Miscellaneous	Ś -	\$ - !		\$ - \$	- Ś	_	\$ 57,362 \$	102,082	\$ -	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	0%	0%	0%	74.2%	37.9%	0%	0%	0%	0%		
IDOT Attribution	\$ -	\$ - !	-	\$ - \$	- \$	-	\$ 42,563 \$	38,689	\$ -	\$ -	\$ -	\$ -		
Construction Services - Payments to Utilities	\$ -	\$ - !	-	\$ - \$	- \$	-	\$ - \$	-	\$ -	\$ -	\$ -	\$ -		
Percentage Attribution to IDOT	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
IDOT Attribution	\$ -	\$ - !	-	\$ - \$	- \$	-	\$ - \$	-	\$ -	\$ -	\$ -	\$ -		
Easement Legal Support - Manikas	ė .	ė .		\$ - \$	- S		\$ - \$	_	\$ -	\$ -	\$ -	ć		
Percentage Attribution to IDOT	0%	0%	0%	5 - 5	- 5	- 0%	5 - 5	- 0%	\$ - 0%	\$ - 0%		\$ - 0%		
IDOT Attribution	\$ -	\$ -	5 -	s - s	- \$	-	\$ - \$		\$ -		\$ -	\$ -		
	1			*	-		7		т	7	7	*		
EPA Oversight	7	\$ - !		\$ - \$	- \$	-	\$ - \$	-	\$ -	\$ -	\$ -	\$ -		
Percent Attribution to IDOT	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
DOT Attribution	\$ -	\$ - !	-	\$ - \$	- \$	-	\$ - \$	-	\$ -	\$ -	\$ -	\$ -		
Fotal Costs	\$ 426,254	\$ 310,353	352,012	\$ 20,880 \$	- \$	-	\$ 932,730 \$	807,329	\$ 74,300	\$ -	\$ -	\$ 77,000		
The Libert Ave the state of	6 241 000	455.433	227.256	¢ 20.000 ¢			£ 710.110 £	205.070	£ 46.000			ć 40.505		
otal IDOT Attribution	\$ 341,003	\$ 155,177	237,256	\$ 20,880 \$	- \$	-	\$ 710,118 \$	305,978	\$ 46,883	\$ -	\$ -	\$ 48,58		

Exhibit F

Cost Allocation and IDOT Attribution Table

				Task	Bucket					Total Site 3			
Work/Cost Type			EPA Oversight		Leg	al Supp	ort Service	es		Total			nd Site 6 Costs
				Site 3 and				Site 3 and			Site 3 and		
Professional Engineering Services - LFR/Arcadis/AECOM	Site		Site 6	Site 6	Site 3	Ś	te 6	Site 6	Site 3 \$ 684,027	Site 6 \$ 679,593	Site 6	<u> </u>	1,363,620
Percentage Attribution to IDOT	\$	- 0%	'	5 -	\$ - 0%	\$	- \$ 0%	- 0%	\$ 684,027	\$ 6/9,593	\$ -	\$	1,363,620
IDOT Attribution	ė		\$ -	\$ -	\$ -	Ś	- S	0%	\$ 477,195	\$ 229,607	\$ -	,	706,802
IDOT Attribution	Ş		ş -	ş -	ş -	Ş	- 3	-	\$ 477,195	\$ 229,607	\$ -	Ş	706,802
Professional Engineering Services - Completion Costs - AECOM Estimate	\$		\$ -	\$ -	\$ -	Ś	- Ś	-	\$ 80,621	\$ 68,250	\$ -	Ś	148,871
Percentage Attribution to IDOT	ľ	0%		0%	0%		0%	0%	Ų 00,021	00,230	Ť	,	110,071
IDOT Attribution	Ś		\$ -	Š -	s -	Ś	- 5	-	\$ 62,401	\$ 20,182	\$ -	Ś	82,583
	T		· F	7	-		-		+	7,	-	7	,
Operations and Maintenance - AECOM Estimate	Ś	-	Ś -	\$ -	Ś -	Ś	- Ś		\$ 310,903	\$ -	\$ -	Ś	310,903
Percentage Attribution to IDOT	I '	0%	0%	0%	0%		0%	0%					,
IDOT Attribution	\$		\$ -	\$ -	\$ -	\$	- \$	-	\$ 248,722	\$ -	\$ -	\$	248,722
Construction Services - Campanella Base Bid	\$	-	\$ -	\$ -	\$ -	\$	- \$	-	\$ 776,068	\$ 410,128	\$ 77,000	\$	1,263,196
Percentage Attribution to IDOT		0%	0%	0%	0%		0%	0%					
IDOT Attribution	\$	-	\$ -	\$ -	\$ -	\$	- \$	-	\$ 532,539	\$ 193,501	\$ 48,587	\$	774,628
Construction Services - Campanella T&M Services	\$	-	\$ -	\$ -	\$ -	\$	- \$		\$ 233,880	\$ 263,834	\$ 325,412	\$	823,126
Percentage Attribution to IDOT		0%	0%	0%	0%		0%	0%					
IDOT Attribution	\$	-	\$ -	\$ -	\$ -	\$	- \$	-	\$ 214,299	\$ 108,270	\$ 206,381	\$	528,950
Construction Services - DMP	\$		\$ -	\$ -	\$ -	\$	- \$		\$ 130,080	\$ 122,170	\$ 297,490	\$	549,740
Percentage Attribution to IDOT		0%	0%	0%	0%		0%	0%					
IDOT Attribution	\$	-	\$ -	\$ -	\$ -	\$	- \$	-	\$ 118,970	\$ 61,085	\$ 186,809	\$	366,864
	4.												
Construction Services - Miscellaneous	\$	-	\$ -	\$ -	\$ -	\$	- \$		\$ 57,362	\$ 102,082	\$ -	\$	159,444
Percentage Attribution to IDOT		0%	0%	0%	0%	s	0% - \$	0%	\$ 42 563	¢ 20.000	4		04.252
IDOT Attribution	\$		\$ -	\$ -	\$ -	\$	- \$	-	\$ 42,563	\$ 38,689	\$ -	\$	81,252
Construction Services - Payments to Utilities	Ś		\$ -	\$ -	\$ -	Ś	- Ś	_	\$ 136,243	\$ 393,331	ć	Ś	529,575
Percentage Attribution to IDOT	۶	- 0%	0%	0%	0%	Ş	- 3	- 0%	\$ 150,245	\$ 595,551	ş -	Ş	329,373
IDOT Attribution	ć		\$ -	\$ -	\$ -	Ś	- Ś	-	\$ 108,320	\$ 121,559	\$ -	Ś	229,879
IDOT ACCIDACION	۲		, -	, -	,	,	- 5	_	3 108,320	\$ 121,555	, -	٦	223,073
Easement Legal Support - Manikas	Ś	_	\$ -	\$ -	\$ -	Ś	- Ś	71,840	\$ -	\$ -	\$ 71,840	Ś	71,840
Percentage Attribution to IDOT	ľ	0%	0%	0%	0%	Ť	0%	47.5%	7	7	71,040	-	. 1,040
IDOT Attribution	Ś		\$ -	\$ -	s -	Ś	- S	34,124	\$ -	\$ -	\$ 34,124	Ś	34,124
* ****	1				1	·	,	,12.			,122.	╫	,
EPA Oversight	\$	233,805	\$ 125,675	\$ -	\$ -	\$	- \$	-	\$ 233,805	\$ 125,675	\$ -	\$	359,480
Percent Attribution to IDOT	1	74.2%		0%	0%		0%	0%					
IDOT Attribution	\$	173,483		\$ -	\$ -	\$	- \$	-	\$ 173,483	\$ 47,631	\$ -	\$	221,114
Total Costs	\$	233,805	\$ 125,675	\$ -	\$ -	\$	- \$	71,840	\$ 2,642,990	\$ 2,165,063	\$ 771,742	\$	5,579,794
Total IDOT Assilhusion	ć	173,483	\$ 47,631	ė	¢	4	- s	34,124	\$ 1,978,492	\$ 820,523	\$ 475,901	\$	3,274,917
Total IDOT Attribution	>	1/3,483	ə 47,631	7		۶	- \$	34,124	1,978,492 ج	⇒ 820,523	ə 4/5,901	ll >	5,2/4,91/

 Manikas Support Site 3/6
 Site 3
 Site 6
 Site 3 and 5
 Total

 Total costs for utility work
 \$ 720,302
 \$ 761,119
 \$ 157,415
 \$ 1,638,837

 Total IDOT Attribution
 \$ 465,271
 \$ 232,114
 \$ 81,275
 \$ 778,660

 Percent IDOT Attribution
 \$ 157,576
 \$ 475,576
 \$ 475,576

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Exhibit G Atwell Survey

SHEET NO.

1 OF 2

PLAT OF TOPOGRAPHIC SURVEY

PART OF SECTIONS 10 AND 15, TOWNSHIP 45 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN LAKE COUNTY, ILLINOIS.



Call before you dig.

MATCHLINE "D" — SANITARY RIM 588.19 N. 48" CONC. INV. 574.71 INSIDE T/PIPE INV. 578.69 S. 48" CONC. INV. 574.71 INSIDE T/PIPE INV. 578.69 08-10-300-007 08-10-300-004 F RAIL 591.28 — F RAIL 591.28 0 PROPERTY LINE N 2,084,000 SB-07 CONTROL CABINET -WER ACCESS STRUCTURE—

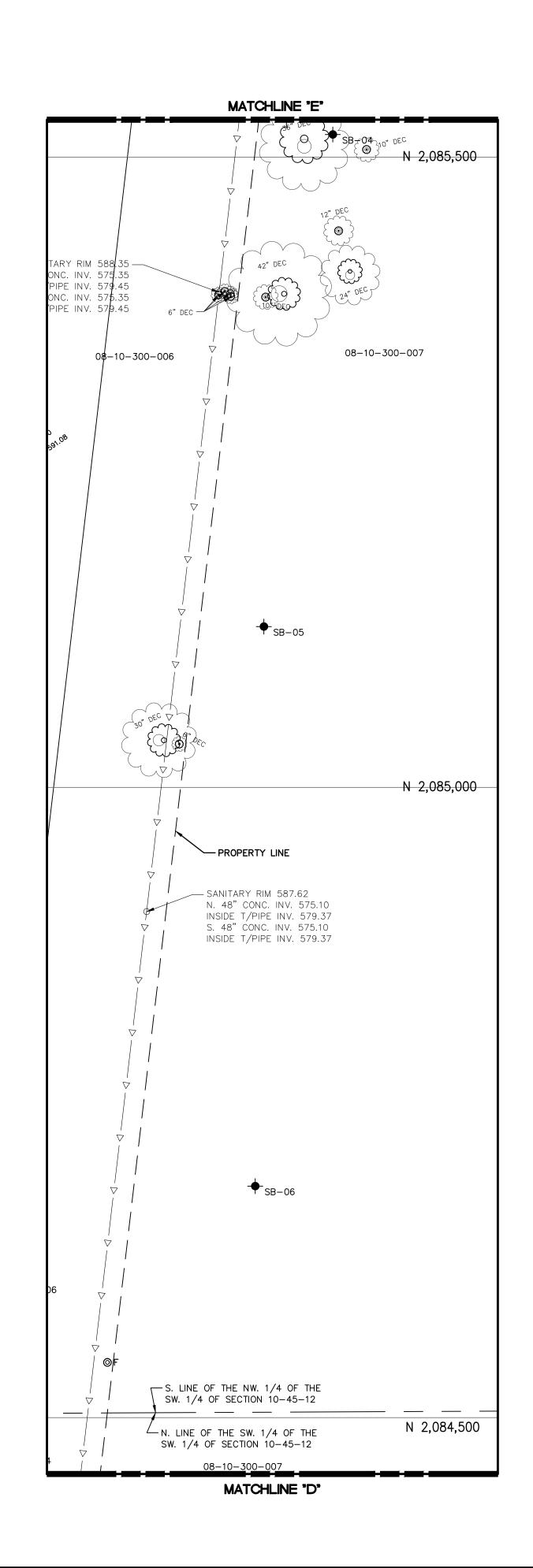
SWEAS CONC. NV. 574.24

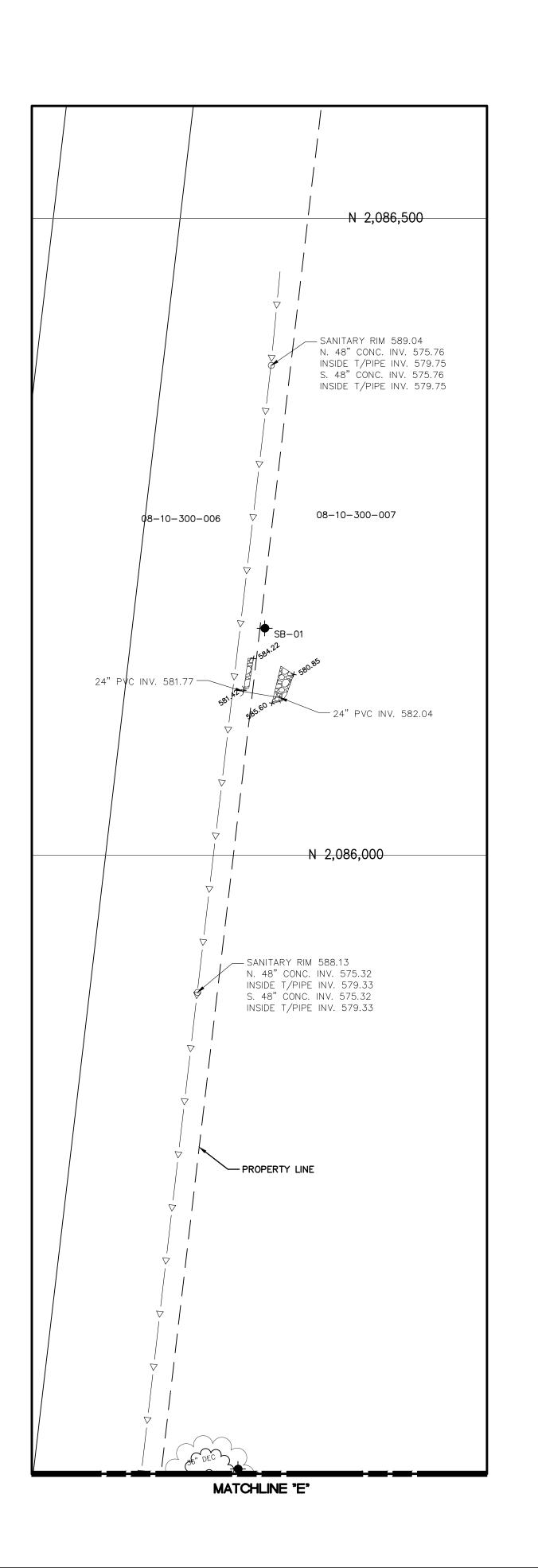
NV. 724" CONC. NV. 575.73

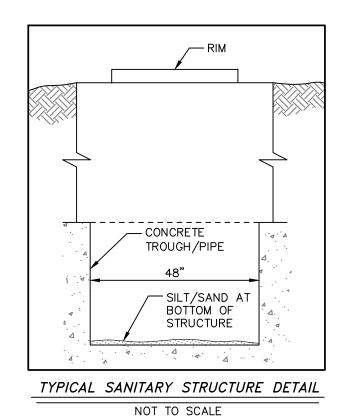
D — ' 08-10-300-007 12" PVC INV. 587.22

RIGHT-OF-WAY LINE CHAIN LINK FENCE WITH BARBED WIRE N 2,083,500

MATCHLINE "C"







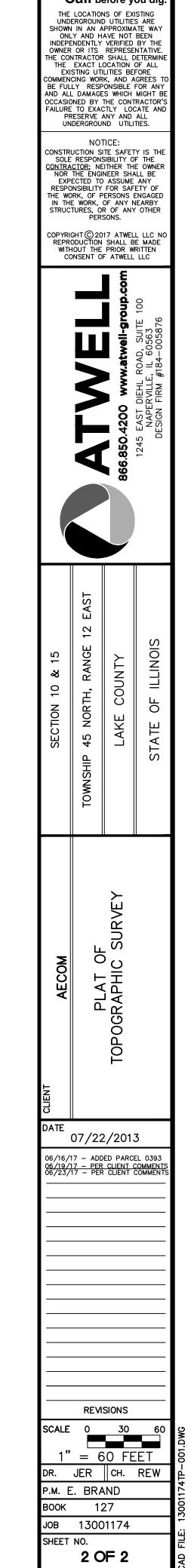


EXHIBIT C

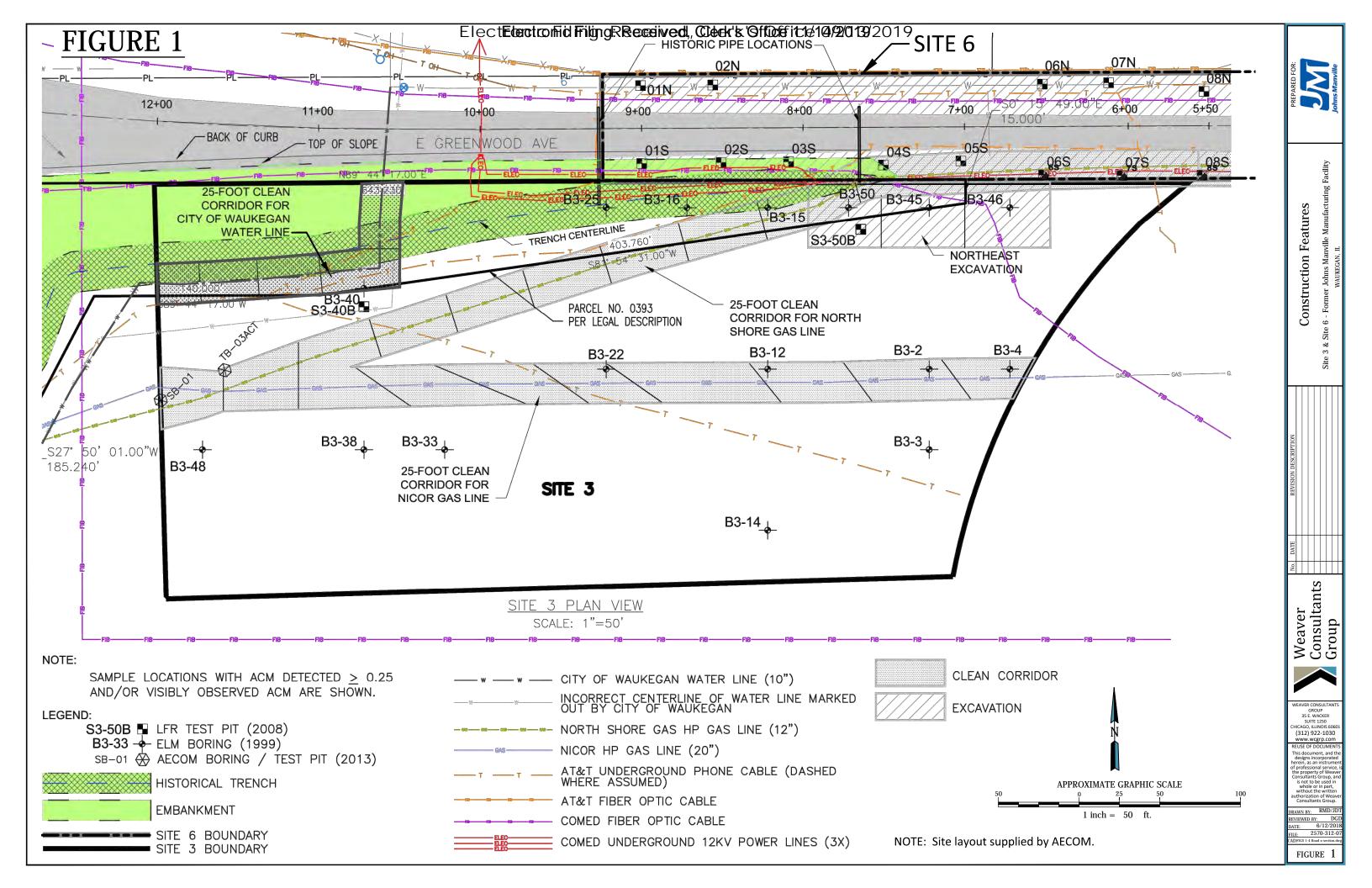


EXHIBIT D

ON DAMAGES ATTRIBUTABLE TO IDOT BASED ON IPCB ORDER OF DECEMBER 15, 2016

Johns Manville

VS

Illinois Department of Transportation

AUGUST 22, 2018



3300 Ginger Creek Drive Springfield, Illinois 62711 Telephone: 217.787.2334

ElectEderotronfiid FriligngReceived, Cleak'k 'Offloffi tale 10/2/01392019

Table of Contents

1.	Purpo	ose and Summary 1					
2.	Qualit	fications		1			
3.	Back	ackground Information2					
4.	Proje	ect Management and Reasonableness of Implementation Cost					
5.	Cost	Cost Attributed to IDOT's Responsibility as Defined by IPCB					
	5.1.	Base M	ap Creation (Gobelman: Figure 1)	3			
	5.2.	Site 3 A	rea within IDOT's Responsibility as Defined by IPCB	5			
	5.3.	Site 6 A	rea within IDOT's Responsibility as Defined by IPCB	5			
6.	Attrib	ution App	oroach	6			
	6.1.	Nicor G	as	7			
	6.2.	City of \	Waukegan Water Line	7			
	6.3.	AT&T		7			
		6.3.1.	Site 3	7			
		6.3.2.	Site 6	8			
		6.3.3.	Sites 3 and 6	8			
	6.4.	Utility/A	CM Soils Excavation	8			
	6.5.	North S	hore Gas	9			
		6.5.1.	Site 3	9			
		6.5.2.	Site 6	9			
		6.5.3.	Sites 3 and 6	10			
	6.6.	Northea	ast Excavation	10			
	6.7.	Dewate	ring	11			
		6.7.1.	Site 3	11			
		6.7.2.	Site 6	12			
		6.7.3.	Sites 3 and 6	12			
	6.8.	Ramp		12			
	6.9.	Filling/C	Capping	12			
		6.9.1.	Site 3	13			
		6.9.2.	Site 6	13			
		6.9.3.	Sites 3 and 6	13			
	6.10.	Genera	I Site/Site Preparation	14			

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		6.10.1.	Site 3	14
		6.10.2.	Site 6	15
		6.10.3.	Sites 3 and 6	15
	6.11.	Health a	nd Safety	15
		6.11.1.	Sites 3 and 6	15
	6.12.	EPA Ov	ersight Costs	16
		6.12.1.	Site 3	16
		6.12.2.	Site 6	16
	6.13.	Cost for	Legal/Legal Support Services	16
7.	IDOT	's Respor	nsibility as Defined by IPCB Attribution Summary	17
8.	IDOT	's Respor	nsibility as Defined by IPCB Attribution	17

FIGURES

Gobelman: Figure 1: Site 3 and Site 6 Base Map

Gobelman: Figure 2: Nicor Location Map

Gobelman: Figure 3: City of Waukegan Water Line Location Map

Gobelman: Figure 4: AT&T Location Map

Gobelman: Figure 5: North Shore Gas Location Map

Gobelman: Figure 6: Northeast Excavation Location Map

Gobelman: Figure 7: Ramp Location Map

Gobelman: Figure 8: Filling/Capping Location Map

TABLE

Gobelman: Table 1 – Cost Allocation Table

LIST OF APPENDICES

Appendix A – Bibliography of Documents Cited

Appendix B – Steven L. Gobelman Resume

Appendix C – Site 3 Layout Issues

Appendix D – Base Map Source Material

Appendix E- Parcel 0393 Legal Description and Map

1. Purpose and Summary

I have been asked by counsel for the Respondent to review and comment on the Expert Report of Douglas G. Dorgan Jr (Report) concerning the former Johns Manville Facility Sites 3 and 6 damages attributable to IDOT dated June 13, 2018. (1) In addition to reviewing the Report, I reviewed some of the footnoted documents citied in the Report, and other historical records available regarding sites 3 and 6. My comments to the Report can be found in Section 3 through 8. Attached to this report are five Appendixes:

- Appendix A is a copy of bibliography of documents cited in this report;
- Appendix B is a copy of my resume;
- Appendix C is a composite of the different survey regarding Site 3;
- Appendix D contains the source reference material used to develop the base map; and
- Appendix E is a copy of the legal description for Parcel 0393.

2. Qualifications

My resume is presented Appendix B.

I obtained a B.S. in Geological Engineering from the University of Missouri-Rolla in 1983 and a M.S. in Geological Engineering from the University of Alaska-Fairbanks in 1985.

I have over 30 years of environmental engineering experience. I began my professional career with the Illinois Environment Protection Agency (Illinois EPA). I have over 7 years of experience with Illinois EPA. My responsibilities at Illinois EPA included: processing and managing underground injection control (UIC) permits; Site Remediation Program (SRP) projects as they related to public and private remediations, including brownfield sites; project manager on Comprehensive Environmental Resource, Compensation, and Liability Act (CERCLA) related cleanups under Illinois EPA's State Funded remediations; project management under Resource Recovery and Conservation Act (RCRA), including RCRA corrective actions, RCRA closures, leaking underground storage tank (LUST) program, and solid waste permits and closures.

I have over 22 years' experience with the Illinois Department of Transportation (IDOT). My responsibilities with IDOT included: waste assessments and investigations; overseeing soil and/or groundwater remediation; assisting construction with waste minimization and management; overseeing IDOT's environmental compliance audit (ECA) process; and the implementation of an environmental management information system (EMIS) for IDOT's maintenance yards and laboratory facilities.

I was also IDOT's technical expert reviewer on Highway Authority Agreements (HAAs). I have reviewed over a thousand HAAs which included determining IDOT's acceptable extent of impacts on our right of way. As part of the HAAs review process and for executed HAAs, I reviewed completed IDOT construction projects that have an existing

1

HAA or as part of a new HAA review and determined IDOT's environmental cost associated with the HAA area, and the allocation of cost involved proportioning costs to a single property from pay items that could involve multiple properties. Some of these HAA reviews required reviewing old construction projects to figure out what was constructed, how it was constructed, what the pay items and quantities were used on the construction project, and change orders associated with the project.

Since August 2015, I have been employed as a Project Director with Andrews Engineering, Inc. (Andrews) in Springfield, Illinois. My responsibilities with Andrews focus on providing technical expertise to industrial and government clients in various environmental issues including CERCLA, RCRA, TSCA, remediation technologies, and transportation. I have reviewed and prepared various cost estimates for potential new work, prepared detailed task driven work plans and cost estimates, and reports on risk assessments, remedial investigation, and feasibility studies. In addition to my role as a Project Director with Andrews, I am also utilized by industrial clients as a review and evaluation licensed professional engineer (RELPE) within the Illinois EPA's Site Remediation Program (SRP).

While at the Illinois EPA, I attended continuing education seminars, one of which was Skill Development in Negotiations of RCRA/CERCLA Disputes. This course provided basic information on negotiations, negotiating for the government, and dispute resolution techniques. While at IDOT, I also attended continued education seminars including Earthwork and Quantities Calculations, Land Acquisition and Survey, Managing Consultant Projects, and IDOT Highway Program Finance.

I am a registered Professional Engineer in Illinois and Indiana and a Licensed Professional Geologist in Illinois. I am a member of the Transportation Research Board (TRB) – ADC60 Committee for Resource Conservation and Recovery in Transportation. My qualifications were also set out in my Rebuttal Report, dated May 29, 2015, and in my testimony from the first hearing in this case.

3. Background Information

In preparation of this rebuttal report, I have review various documents from the previous hearing, documents presented regarding the cost allocation phase, the Illinois Pollution Control Boards (IPCB) opinion and order dated December 15, 2016 (2), and Mr. Dorgan's, Dr. Ebihara's, and Mr. Peterson's depositions.

According to Mr. Dorgan's Report (1), various tasks required by USEPA and performed with respect to Site 3 and Site 6 fell in what was called "Task Buckets". I have utilized the same "Task Buckets" in this report to determine the costs attributed to IDOT based on the IPCB opinion and order.

- Nicor Gas
- City of Waukegan Water Line
- AT&T

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- ComEd
- Utility/Asbestos Containing Material (ACM) Excavation
- North Shore Gas
- Dewatering
- Northeast Excavation
- Filling and Capping
- Ramp
- General Site/Site Preparation
- Health and Safety
- EPA Oversight
- Legal Support Services

4. Project Management and Reasonableness of Implementation Cost

Mr. Dorgan opined that the implementation costs Johns Manville (JM) incurred were reasonable. Based on my review of the information, I have no reason to dispute the accuracy of the costs paid by JM.

5. Cost Attributed to IDOT's Responsibility as Defined by IPCB

5.1. Base Map Creation (Gobelman: Figure 1)

As stated in the IPCB opinion and order (2), "...IDOT caused open dumping of ACM waste along the south side of Greenwood Avenue within Site 6 (1S-4S) and adjacent areas along the north edge of Site 3 (B3-25, B3-16, and B3-15). Additionally, IDOT allowed open dumping on Parcel 0393 (B3-25, B3-16, B3-50, and B3-45 (to the extent sample B3-45 falls on Parcel 0393)."

In order to assess the costs attributed to IDOT based on the above order, I had to create a base map (Gobelman: Figure 1) locating Sites 3 and 6, as well as the location of the IPCB referenced soil sampling locations and areas remediated. My review of the various figures showing the location of Sites 3 and 6 revealed the location of Sites 3 and 6 were not consistently located on the various figures. For example, the Plat of Topographic Survey (Atwell Survey Exhibit G of Mr. Dorgan's Report) (1) does not match up with surveyed corners of Site 3 as presented on Figure 2 in the AECOM Final Report (3) or Mr. Dorgan's Figure 1 (1), as shown in Appendix C, Ex 1.

To evaluate the existing figures of Site 3, I started with the assumption that Mr. Dorgan's Exhibit G Atwell Survey was a correct survey of Site 3. To confirm that assumption, I used Figure 2 in the Final Report that contained grid coordinates of the four corners of Site 3. The corner grid coordinates did not match the corners located by the Atwell Survey. I then used Mr. Dorgan's Report Figure 1 and overlaid that figure over the Atwell

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Survey and Final Report Figure 2. As shown in Appendix C, Ex 1 provides the results of the overlay.

Based on the inconsistent location of Site 3, I created a site map utilizing current existing conditions. The site map utilized a background Google 2018 image of Site 3 showing the fencing around Site 3, as shown in Figure 1 of this report (Gobelman: Figure 1). I assumed that Site 3 was contained within the shown fencing except in the northwest and northeast corner of Site 3. In the northwest corner of Site 3 the fenceline appears to drop along the embankment slope. Site 3 was extended to the north in the northwest corner across the embankment to connect to the western boundary of Site 3. The northeast corner of the fence extends beyond the location of Site 3. The fenceline in the northeast corner extends further east than the boundary of Site 3, as shown in Final Report Figure 1 (JM004034). I compared the base map created (Gobelman: Figure 1) with the overlay prepared in Ex-1 and presented the results in Appendix C, Ex-2.

The location of Parcel 0393 was located on Gobelman: Figure 1 based on the legal description from the Grant for Public Highway dated August 3, 1971 (Hearing Exhibit 41 - 1) (4) and IDOT as-build plans pages 23 and 24 (JM001153 and JM001154, Hearing Exh. 21A-23 & 24) (5). Parcel 0393 begins at the intersection of the easterly line of Pershing Road (former Sand Street) and the south line of Greenwood Avenue. The 1971 plan sheets (5) show that IDOT Stationing 7+00 on Greenwood Avenue is at the eastern edge of Parcel 0393.

Soil sampling locations were placed on the base map based on Site 3 ELM Figure 15 (6) (JM000565, Hearing Exh. 57-536). The lengths of the western and southern boundary were marked on Figure 15. The western boundary stated the length to be 267.5 feet and the southern boundary length to be 493 feet. The Gobelman: Figure 1 indicates that the western boundary length is 267 feet and the southern boundary length is 497 feet. The difference in the southern boundary lengths could be based on fence line being used as the southern boundary of Gobelman: Figure 1.

The scale on Figure 15 indicates that the soil sampling location of B3-26 is 23.1 feet from the western boundary of Site 3 and soil sample locations B3-25, B3-1, B3-50, and B3-45 are approximately 19.7 feet south of the line drawn representing the northern extent of Site 3. This distance disagrees with the scaled distance of 15 feet used in the Mr. Dorgan's Figure 1. Mr. Dorgan does not explain in his report how he developed Figure 1. The 4.7 feet difference between Gobelman's: Figure 1 of 19.7 feet and Mr. Dorgan's Figure 1 of 15 feet is important to the location of soil sample location B3-45.

Mr. Dorgan's Report places the location of soil sample location B3-45 slightly in or on the boundary of Parcel 0393, whereas Gobelman: Figure 1 places the location approximately 3 feet outside of Parcel 0393.

Soil sampling locations (1S - 9S) along the south side of site 6 were marked on Gobelman: Figure 1 based on AECOM's Work Plan rev 2, March 13, 2014, Sheet C-0022 (7) JM004753 (Hearing Exh. 66-99). Based on Sheet C-0022 the distance from

the western edge of Site 6 to soil sampling location 9S is 419 feet. All figures developed included Mr. Dorgan's Figure 1 (1) showed that soil sampling location 8S is at the northeast corner of Site 3 and is also shown on Sheet C-0022. Based on the scale of Sheet C-0022 the remaining sampling locations on Site 6 were placed on the Gobelman: Figure 1 base map.

The location of the Northeast Excavation was also based on Sheet C-0022 (7) JM004753. Sheet C-0022 shows the length of the Northeast Excavation to be 150 feet and the western edge of the Northeast Excavation to be located east of soil sampling 3S and the eastern edge to be located slightly east of sampling 6S. Based on the scaling of Sheet C-0022 the distance from soil sampling location 9S to the eastern edge of the Northeast Excavation is approximately 140 feet.

The location of the Nicor line, North Shore Gas line, and City of Waukegan Water line were located based on the AECOM's Final Report: Southwestern Site Area – Site 3, 4/5, and 6, dated March 20, 2018 (3) JM 0040322. The locations of the AT&T lines were located based on Mr. Dorgan's Report (1) Figure 1.

5.2. Site 3 Area within IDOT's Responsibility as Defined by IPCB

IDOT's responsibility as defined by IPCB within Parcel 0393 includes the soil boring locations B3-25, B3-15, B3-16, B3-50, and B3-45 (to the extent sample B3-45 falls on Parcel 0393). Therefore, the extent to the west within Parcel 0393 to soil sample location B3-26 (first soil sample location that did not detect ACM at any depth). As previously discussed, I located soil sample locations B3-45 outside of Parcel 0393 and, therefore, the extent within Parcel 0393 to the east would be the mid-point between soil sample location B3-50 and B3-45. However, for allocation costs in Site 3 within IDOT's responsibility as defined by IPCB, I will utilize the eastern edge of Parcel 0393. Making the extent of the eastern edge of Parcel 0393 removes arguments of the location of B3-45 given the difference between my location and Mr. Dorgan's location is 4.7 feet and the location of B3-45 is scaled off a map and the exact location was not identified.

In Mr. Dorgan Report, he incorrectly interprets the IPCB defined area of IDOT's responsibility to include all costs within Parcel 0393 with no consideration to the IPCB's defined area based on soil sample locations within Parcel 0393.

5.3. Site 6 Area within IDOT's Responsibility as Defined by IPCB

Mr. Dorgan is correct that the IPCB found IDOT liable for only soil sampling locations 1S through 4S along the south side of Site 6. However, the IPCB did not define IDOT liable for any impacts along the south side of Site 6 associated with soil sample locations 5S through 8S.

Soil sampling logs in the Engineering Evaluation/Cost Analysis, Revision 4 (8) (JM001945, JM001947, JM001949, and JM001951, Hearing Exh. 63-294, 269, 298, and 300) showed that the test pits went down to a depth of 3 feet in soil sampling location 5S

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through 7S and 8S was stopped at 1 foot due to a buried dead electric line. The boring log for 5S showed transite and roofing material in each of the three sampling locations. Boring log for 6S showed transite in each of the three sampling locations and roofing material in the top two sampling locations. Boring log for 7S indicated that there was roofing material in the first foot, transite in the second foot, and brake shoes in the third foot. Boring log for 8S showed transite in the only sample in the first foot.

From the final report's (3) Table 8 (JM0039106), the depth of the excavation confirmation samples on the south side of Site 6 between 1S and 4S was at least 7 feet below ground surface (bgs). The depth of the excavation samples between 5S and 9S was at least 5.9 feet bgs.

IDOT's construction plans (5) from 1971 showed that roadway construction on Greenwood Avenue started at Station 7+60 and extended east to Station 7+00 for resurfacing. Station 7+00 is also the eastern edge of Parcel 0393. The construction of Detour Road A ends at approximately Station 15+40 along Detour Road A which is near Station 5+07 along Greenwood Avenue. The cross-section of Detour Road A (JM001154) (Exh. 21A-24) indicates that fill material depth tapered from 0 feet near Station 5+07 to an approximate depth of 2.5 feet of fill along Detour Road A which relates to Greenwood Avenue Stationing 7+00. The Site 6 area that relates to IDOT's construction Stationing 7+00 to 5+07 is soil sampling location 5S through 9S.

The IPCB ruled that the eastern edge of the reconstruction of Greenwood Avenue was near soil sampling location 4S which is near IDOT's Station 7+60 the beginning of the Greenwood Avenue roadway construction. The IPCB further ruled that IDOT did not open dump ACM waste in the construction of Detour Road A which is associated with borings 5S through 8S. Based on the amount of fill material used to create Detour Road A (2.5 feet or less), the depth of ACM found in the site investigation (3 feet or more), and JM's remedial excavation depth of 6 to 7.5 feet, I do not see any new information that would be considered new evidence to increase the area defined by the IPCB.

6. Attribution Approach

Mr. Dorgan created a Cost Allocation and IDOT Attribution Table that was presented in Exhibit F of Dorgan's Report. In order to simplify the process for the IPCB I will also utilize the same format to determine IDOT's costs allocation as defined by IPCB ruling (Gobelman: Table 1). The next subsections will discuss how the costs allocation will be assigned to IDOT based on IDOT's responsibility as defined by IPCB. Based on the allocation evaluation presented in this report, IDOT's responsibility as defined by IPCB is \$489,891 of JM's \$5,579,794 total Implementation Cost.

6.1. Nicor Gas

I concur with Mr. Dorgan's opinion that the costs incurred in creating a clean corridor around the Nicor Gas line is not within Site 3 as defined by IPCB, as shown on Gobelman: Figure 2.

6.2. City of Waukegan Water Line

The water line is located approximately 100 feet west of soil sampling location B3-26, near soil sample location B3-36 which did not detect ACM within any sampling depth (6). The water line is located west of soil sampling location B3-25, the farthest western location identified as IDOT's responsibility as defined by IPCB. I disagree with Mr. Dorgan's assessment that the water line cost within Site 3 is attributable to IDOT's responsibility as defined by IPCB. The water line is outside of the area within Site 3 that IDOT's responsibility as defined by IPCB, as shown on Gobelman: Figure 3.

6.3. AT&T

Mr. Dorgan stated that three AT&T telephone lines were located in Site 3. Two of the lines travelled within Parcel 0393 and the third line is located southwestern boundary of Parcel 0393 and runs southeasterly across site 3 outside of IDOT's defined responsibility. In addition, one line runs on the north side of Site 6 and another line runs on the south side of Site 6, as shown on Gobelman: Figure 4. I agree with Mr. Dorgan's assessment of the location of the AT&T telephone lines within Sites 3 and 6, as shown on Mr. Dorgan's report Figure 1. However, I disagree with Mr. Dorgan's cost attribution.

Service	Site 3	Site 6	Sites 3 and 6
Professional –	\$26,524	\$31,105	
Engineering Related			
to AT&T			
Professional –		\$15,000	
Completion Related			
to AT&T			
Construction – T&M			\$53,548
Related to AT&T			
Construction –			\$45,350
Management			
Related to AT&T			
Utility Payment to	\$82,127	\$238,161	
AT&T			
Total	\$108,651	\$284,266	\$98,898
IDOT Attribution	\$17,601	\$5,117	\$5,736

6.3.1. Site 3

Within Site 3 the three AT&T telephone lines equal to approximately 1,150 linear feet. The three AT&T telephone lines equal to approximately 187 linear feet within the area

attributed to IDOT's responsibility as defined by IPCB or approximate 16.3 percent of the total costs within Site 3. The proportionate cost attributed to IDOT's responsibility as defined by IPCB is \$17,601.

6.3.2. Site 6

The length of the northern corridor is approximately 2,820 linear feet and southern corridor on Site 6 is approximately 2,650 linear feet each, for a total length of approximately 5,470 linear feet (3) JM0040329. The length attributed to IDOT's responsibility as defined by IPCB is 47 linear feet, from where the AT&T telephone line enters Site 6 to the east of soil sampling location 3S and ends halfway between 4S and 5S. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 1.8 percent and the proportionate cost for Site 6 is \$5,117.

6.3.3. Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the costs that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the costs attributed to IDOT's responsibility as defined by IPCB (\$22,718) by the total Sites 3 and 6 costs (\$392,917). The percentage attributed to the combined Sites 3 and 6 costs is 5.8 percent (22,718/392,917). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$5,736.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for AT&T work performed attributable to IDOT is \$28,454, as shown in Gobelman: Table 1.

6.4. Utility/ACM Soils Excavation

As stated in Mr. Dorgan's report, excavation of ACM impacted soils occurred on both sides of Site 6. As calculated above in Section 6.3.2 AT&T Site 6, the total length of Site 6 is approximately 5,470 linear feet. The length attributed to IDOT's responsibility as defined by IPCB is 197 linear feet, from the western edge of Site 6 to halfway between 4S and 5S. The percent of the costs attributed to IDOT is 3.6 percent and the proportionate cost for Site 6 is \$5,591.

Service	Site 3	Site 6	Sites 3 and 6
Construction – Base Bid		\$155,318	
Soils for Site 6			
Total		\$155,318	
IDOT Attribution		\$5,591	

6.5. North Shore Gas

A clean corridor for the entire North Shore Gas line was created on Sites 3 and 6, as shown on Gobelman: Figure 5. The clean corridor within Site 3 was created with the North Shore Gas line left in-place. In Site 6, the North Shore Gas line was capped near soil sampling location 4S and remainder of the line to the east was removed from the south side of Site 6.

Service	Site 3	Site 6	Sites 3 and 6
Professional –	\$135,159	\$81,028	
Engineering for			
North Shore Gas			
Construction – T&M	\$162,678		\$22,327
for North Shore Gas			
Construction –			\$35,830
Management for			
North Shore Gas			
Utility Payment to	\$34,687	\$153,833	
North Shore Gas			
Total	\$332,524	\$234,861	\$58,157
IDOT Attribution	\$90,779	\$3,993	\$9,712

6.5.1. Site 3

The North Shore Gas line crosses Site 3 and a portion of Parcel 0393 near soil sampling location B3-15 and B3-50 (defined by the IPCB as being within IDOT liability). The distance the North Shore Gas line traverses diagonally across Site 3 with a corridor area is 12,016 square feet (25 foot corridor width). The area of the North Shore Gas line that impacts Parcel 0393 within IDOT's responsibility as defined by IPCB is approximately 3,278 square feet or about 27.3 percent of the total cost within Site 3. The proportionate cost attributed to IDOT is \$90,779.

6.5.2. Site 6

As Mr. Dorgan stated, the capping of the clean corridor occurred within Site 6 near soil sampling location 4S. All capping of the North Shore Gas line on Site 6 was limited to the area around soil sampling location 4S is attributable to IDOT's responsibility as defined by IPCB.

Mr. Dorgan states that the length along the south side of Site 6 is approximately 2,005 linear feet. The length attributed to IDOT's responsibility as defined by IPCB is approximately 35 linear feet, from where the North Shore Gas line enters Site 6 to the west of soil sampling location 4S and ends just east of soil sampling location 4S. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 1.7 percent and the proportionate cost for Site 6 is \$3,993.

6.5.3. Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the costs that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the costs attributed to IDOT's responsibility as defined by IPCB (\$94,772) by the total Sites 3 and 6 costs (\$567,385). The percentage attributed to the combined Sites 3 and 6 costs is 15.1 percent (94,772/567,385). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$9,712.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for North Shore Gas line work performed within IDOT's responsibility as defined by IPCB is \$104,484, as shown in Gobelman: Table 1.

6.6. Northeast Excavation

The Northeast Excavation is shown on the work plan (7) to be 150 feet by 50 feet or 7,500 square feet. Part of the Northeast Excavation area is incorporated within Parcel 0393 as it relates to the area IDOT's responsibility as defined by IPCB, as shown on Gobelman: Figure 6. Even though, my assessment of soil sample location B3-45 fall outside of Parcel 0393, I have elected to include the full eastern extent of Parcel 0393 within the Northeast Excavation.

As discussed earlier, the difference between Mr. Dorgan and my location of B3-45 is approximately 4 feet. The location of B3-45 is subjective based on its location on previous figures and reports. The additional cost allocated to the Northeast Excavation area that would be attributed to this increased area is approximately 5 percent.

The area of Parcel 0393 contained within the Northeast Excavation is approximately 1,905 square feet or 25.4 percent of the Northeast Excavation. As a result, the portion of JM's costs for Northeast Excavation work performed attributable to IDOT's responsibility as defined by IPCB is \$12,683, as shown in Gobelman: Table 1.

Service	Site 3	Site 6	Sites 3 and 6
Professional – Engineering for	\$3,977		
Northeast Excavation			
Professional – Completion	\$10,000		
Costs for Northeast Excavation			
Construction – Base Bid for	\$35,957		
Northeast Excavation			
Total	\$49,934		
IDOT Attribution	\$12,683		

6.7. Dewatering

Dewatering was required to remove the high water within both Sites 3 and 6 in order for work related to the clean corridor construction for the Nicor line, North Shore Gas line, City of Waukegan Water line, and the Northeast Excavation.

Service	Site 3	Site 6	Sites 3 and 6
Construction – Base Bid for	\$140,800	\$159,250	
Dewatering			
Construction – T&M for	\$24,325		\$17,675
Dewatering			
Construction – Management	\$74,530		\$21,500
for Dewatering			
Construction Services –	\$19,429	\$1,337	
Payments to Utilities			
Total	\$259,084	\$160,587	\$39,175
IDOT Attribution	\$40,417	\$37,738	\$7,287

6.7.1. Site 3

For Site 3, dewatering was required during the construction of the clean corridor associated with the Nicor line, North Shore Gas line, the City of Waukegan Water Line, and Northeast Excavation. As previously discussed IDOT was not liable for the Nicor line and the City of Waukegan Water Line. IDOT's responsibility as defined by IPCB was proportionate liable for 27.3 percent or \$90,779 of the North Shore Gas line cost within Site 3 and 25.4 percent or \$12,683 of the Northeast Excavation cost.

Service	Site 3	IDOT's Allocation
Nicor Line	\$218,090	\$0
North Shore Gas	\$332,524	\$90,779
Line		
City of Waukegan	\$61,037	\$0
Water Line		
Northeast	\$49,934	\$12,683
Excavation		
Total	\$661,585	\$103,462

To determine the percentage of the work associated with IDOT's responsibility as defined by IPCB liability, I divided the total cost attributed to IDOT's responsibility as defined by IPCB in Site 3 (\$103,462) by the total cost to complete the work for the Nicor line, North Shore Gas line, the City of Waukegan Water Line, and Northeast Excavation (\$661,585). This percentage, 15.6 percent (103,462/661,585), is the percent of the dewatering cost allocated to IDOT's responsibility as defined by IPCB liability. Therefore, JM's total costs for dewatering activities on Site 3 that are attributable to IDOT's responsibility as defined by IPCB totals \$40,417.

6.7.2. Site 6

For Site 6, dewatering was required during the construction of the clean corridor for the north and south side of Site 6. As stated in Mr. Dorgan's report he attributed 50 percent of the dewatering costs to IDOT's responsibility as defined by IPCB. In addition, Mr. Dorgan used soil sampling locations 1S to approximately 9S to define the Site 6 area. The final work plan indicates that the length of the south side of Site 6 is 419 linear feet (from the western end of Site 6 to soil sampling location 9S), as shown on Gobelman: Figure 1. Therefore the total length of dewatering in Site 6 is 838 linear feet (making the length of the north side and south side equal).

The length attributed to IDOT's responsibility as defined by IPCB is 197 linear feet, from where the western edge of Site 6 to halfway between 4S and 5S. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 23.5 percent and the proportionate cost for Site 6 is \$37,738.

6.7.3. Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the cost that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the cost attributed to IDOT's responsibility as defined by IPCB (\$78,155) by the total cost from Sites 3 and 6 (\$419,671). The percentage attributed to the combined Sites 3 and 6 costs is 18.6 percent (78,155/419,671). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB cost is \$7,287.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for dewatering work performed and attributable to IDOT is \$85,442, as shown in Gobelman: Table 1.

6.8. Ramp

Due to site conditions it was not practical to install the required vegetative cap in an area on the northwest corner of Site 3. Instead of a vegetative cap a three inch stone aggregate layer was placed over the compacted clay in lieu of topsoil, adjacent to a low off-site wet area (3). Since this work occurred within Parcel 0393 and is located to the west of soil sampling location B3-25 it is located outside of IDOT's responsibility as defined by IPCB liability area, as shown on Gobelman: Figure 7. The associated cost of \$20,880 is not attributable to IDOT's responsibility as defined by IPCB.

6.9. Filling/Capping

A vegetative soil cap (cap) was installed across Site 3. As stated in the Final Report (3), Site 3 is comprised of 3.1 acres. Filling/Capping costs include the removal of soils from both north and south sides of Site 6 (1). Mr. Dorgan's cost breakdowns include:

Service	Site 3	Site 6	Sites 3 and 6
Construction – Base Bid for	\$328,983		
Filling/Capping			
Construction – T&M for	\$41,721	\$188,183	\$231,862
Filling/Capping			
Construction – Management	\$55,550	\$122,170	\$120,150
for Filling/Capping			
Total	\$426,254	\$310,353	\$352,012
IDOT Attribution	\$27,707	\$11,173	\$18,657

6.9.1. Site 3

For Site 3, the area defined by the IPCB includes the area associated with soil sampling locations B3-25, B3-16, B3-15, and B3-50. This area extends to the west within Parcel 0393 to between B3-26 (first clean soil sampling location west of B325). As stated above, the eastern extent extends to the eastern boundary of Parcel 0393. This area equates to 0.2 acres or 6.5 percent of Site 3, as shown on Gobelman: Figure 8.

Therefore, JM's costs for dewatering activities on Site 3 that are attributable to IDOT's responsibility as defined by IPCB total \$27,707.

6.9.2. Site 6

The length of the northern and southern corridor on Site 6 is approximately 5,470 linear feet. The length attributable to IDOT's responsibility as defined by IPCB from the western boundary of Site 6 to the mid-point between 4S and 5S is 197 linear feet. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 3.6 percent and the proportionate cost for Site 6 is \$11,173.

6.9.3. Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the cost that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the cost attributed to IDOT's responsibility as defined by IPCB (\$38,879) by the total Sites 3 and 6 costs (\$736,607). The percentage attributed to the combined Sites 3 and 6 costs is 5.3 percent (38,879/736,607). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$18,657.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for dewatering work performed and attributable to IDOT is \$57,536, as shown in Gobelman: Table 1.

6.10. General Site/Site Preparation

The General Site/Site Preparation Task Bucket, according to Mr. Dorgan, includes but is not limited to general project management, support to and interface with regulatory authorities, professional services oversight of construction activities, installation and maintenance of stormwater controls, traffic control, and clearing and grubbing the sites in preparation for construction. (1)

Service	Site 3	Site 6	Sites 3 and 6
Professional – Engineering	\$335,534	\$519,027	
Professional – Completion	\$70,621	\$53,250	
Cost			
Professional – O&M	\$310,903		
Construction – Base Bid	\$138,310	\$95,560	
Construction – T&M		\$37,410	
Construction – Management			\$74,300
Construction – Misc.	\$57,362	\$102,082	
Total	\$932,730	\$807,328	\$74,300
IDOT Attribution	\$99,803	\$41,981	\$5,573

6.10.1. Site 3

Using the same process as Mr. Dorgan did in his report (1); I divided the portion of Site 3 cost for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$189,187), by the Site 3 costs for Construction Services (\$1,476,454). The Professional Engineering Services - Engineering percentage is 12.8 percent (189,187/1,476,454). The Professional Engineering Services - Engineering cost attributed to IDOT's responsibility as defined by IPCB on Site 3 is \$45,508.

The same percentage (12.8 percent) utilized for the Professional Engineering Services – Completion Cost on Site 3 equated to \$9,039 to IDOT's responsibility as defined by IPCB.

Using the same percentage (6.5 percent) that is used in the Site 3 vegetative cap installation, the Site Preparation Professional Engineering Services O&M on Site 3 equates to \$20,209 to IDOT's responsibility as defined by IPCB.

The percentage (12.8 percent) utilized for the Construction Services Base Bid on Site 3 equated to \$17,704 to IDOT's responsibility as defined by IPCB.

The percentage (12.8 percent) utilized for the Construction Miscellaneous costs on Site 3 equated to \$7.342 to IDOT's responsibility as defined by IPCB.

Therefore, JM's costs for site preparation on Site 3 that are attributable to IDOT's responsibility as defined by IPCB total \$99,803.

6.10.2. Site 6

Using the same process as Mr. Dorgan did in his report (1); I divided the portion of Site 6 costs for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$63,612), by the Site 3 costs for Construction Services (\$1,232,059). The Professional Engineering Services - Engineering percentage is 5.2 percent (63,612/1,232,059). The Professional Engineering Services - Engineering cost attributed to IDOT's responsibility as defined by IPCB on Site 6 is \$26,989.

The same percentage (5.2 percent) is utilized for the Professional Engineering Services – Completion Cost on Site 6 equated to \$2,769 to IDOT's responsibility as defined by IPCB.

The percentage (5.2 percent) utilized for the Construction Services Base Bid on Site 6 equated to \$4,969 to IDOT's responsibility as defined by IPCB.

The percentage (5.2 percent) utilized for the Construction T&M costs on Site 6 equated to \$1,945 to IDOT's responsibility as defined by IPCB.

The percentage (5.2 percent) utilized for the Construction Miscellaneous costs on Site 6 equated to \$5,308 to IDOT's responsibility as defined by IPCB.

Therefore, JM's costs for site preparation on Site 6 that are attributable to IDOT's responsibility as defined by IPCB total \$41,981.

6.10.3. Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the costs that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the costs attributed to IDOT's responsibility as defined by IPCB (\$41,391) by the total Sites 3 and 6 costs (\$548,602). The percentage attributed to the combined Sites 3 and 6 costs is 7.5 percent (41,391/548,602). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$5.573.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for dewatering work performed and attributable to IDOT is \$147,357, as shown in Gobelman: Table 1.

6.11. Health and Safety

6.11.1. Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the cost that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the Construction Services cost attributed to IDOT's responsibility as defined by IPCB (\$41,391) by the total Sites 3 and 6 costs (\$548,602). The

percentage attributed to the combined Sites 3 and 6 costs is 7.5 percent (41,391/548,602). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$5,775, as shown in Gobelman: Table 1.

6.12. EPA Oversight Costs

Reimbursement cost for USEPA oversight costs.

Service	Site 3	Site 6
EPA Oversight	\$233,805	\$125,675
Total	\$233,805	\$125,675
IDOT Attribution	\$29,927	\$6,535

6.12.1. Site 3

Using the same process as Mr. Dorgan did in his report (1), the portion of Site 3 costs for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$189,187), by the Site 3 costs for Construction Services (\$1,476,454). Then applying this percentage (12.8 percent) to the cost for USEPA Oversight on Site 3 is \$29,927, as shown in Gobelman: Table 1.

6.12.2. Site 6

Using the same process as Mr. Dorgan did in his report (1), the portion of Site 6 cost for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$63,612), by the Site 3 costs for Construction Services (\$1,232,059). Then applying this percentage (5.2 percent) to the cost for USEPA Oversight on Site 6 is \$6,535, as shown in Gobelman: Table 1.

6.13. Cost for Legal/Legal Support Services

Legal support services were related to negotiation of easements and other agreements for Sites 3 and 6 for required utility work. I did not analyze the attribution or reasonableness of these costs to the allocation process. As calculated in Mr. Dorgan's report (1), the allocation percentage was calculated by dividing the cost attributed to IDOT's responsibility as defined by IPCB for utility work (\$138,530) by utility related work for Site 3, Site 6, and Site 3/6 (\$1,638,837). The percentage attributed to the legal support services is 8.5 percent (138,530/1,638,837). As applied to JM's cost for Legal Support Services (\$71,840), IDOT's responsibility as defined by IPCB for Legal Support Services is \$6,106, as shown in Gobelman: Table 1.

7. IDOT's Responsibility as Defined by IPCB Attribution Summary

IDOT's responsibility as defined by IPCB cost allocation amounts are presented in the following table:

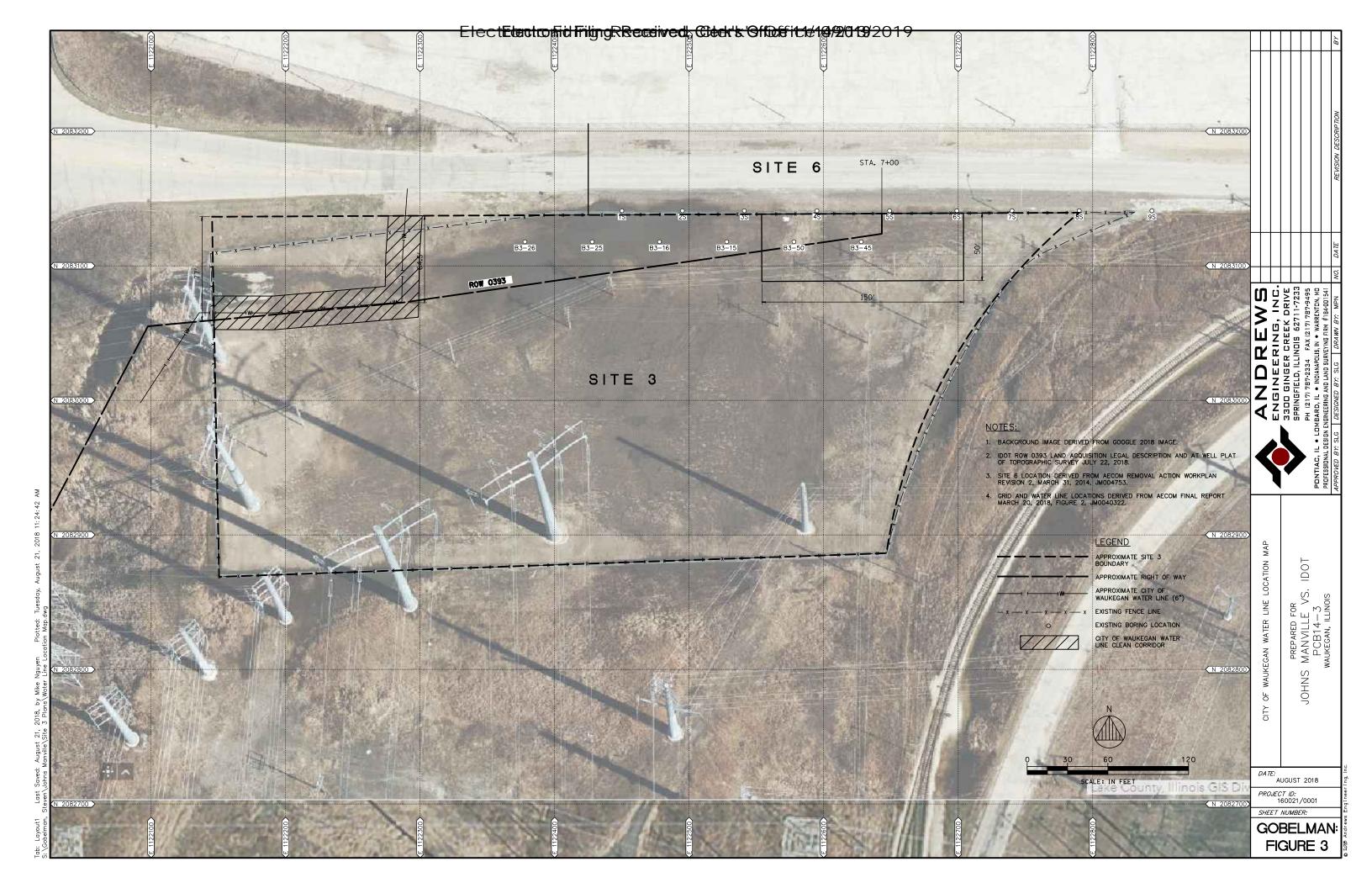
Task Bucket	Site 3	Site 6	Sites 3 and 6	Total
Nicor Gas	\$0	\$0	\$0	\$0
City of Waukegan Water Line	\$0	\$0	\$0	\$0
AT&T	\$17,601	\$5,117	\$5,736	\$28,454
Utility/ACM Excavation	\$0	\$5,591	\$0	\$5,591
North Shore Gas	\$90,779	\$3,993	\$9,712	\$104,484
Northeast Excavation	\$12,683	\$0	\$0	\$12,683
Dewatering	\$40,417	\$37,738	\$7,287	\$85,442
Ramp	\$0	\$0	\$0	\$0
Filling/Capping	\$27,707	\$11,173	\$18,657	\$57,537
General Site/Site Preparation	\$99,803	\$41,981	\$5,573	\$147,357
Health and Safety	\$0	\$0	\$5,775	\$5,775
USEPA Oversight Cost	\$29,927	\$6,535	\$0	\$36,462
Legal Support	\$0	\$0	\$6,106	\$6,106
Total	\$318,917	\$112,128	\$58,846	\$489,891

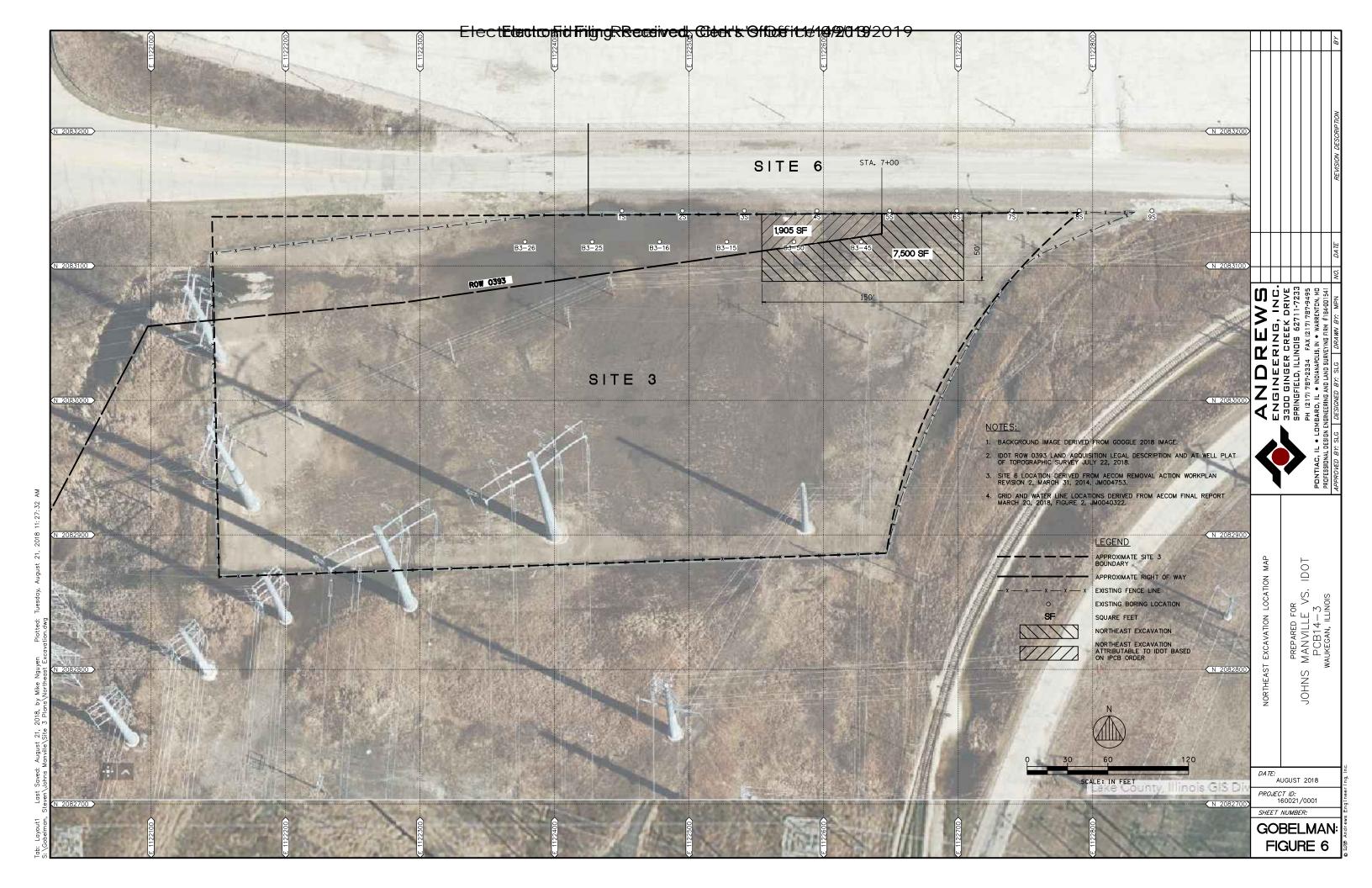
8. IDOT's Responsibility as Defined by IPCB Attribution

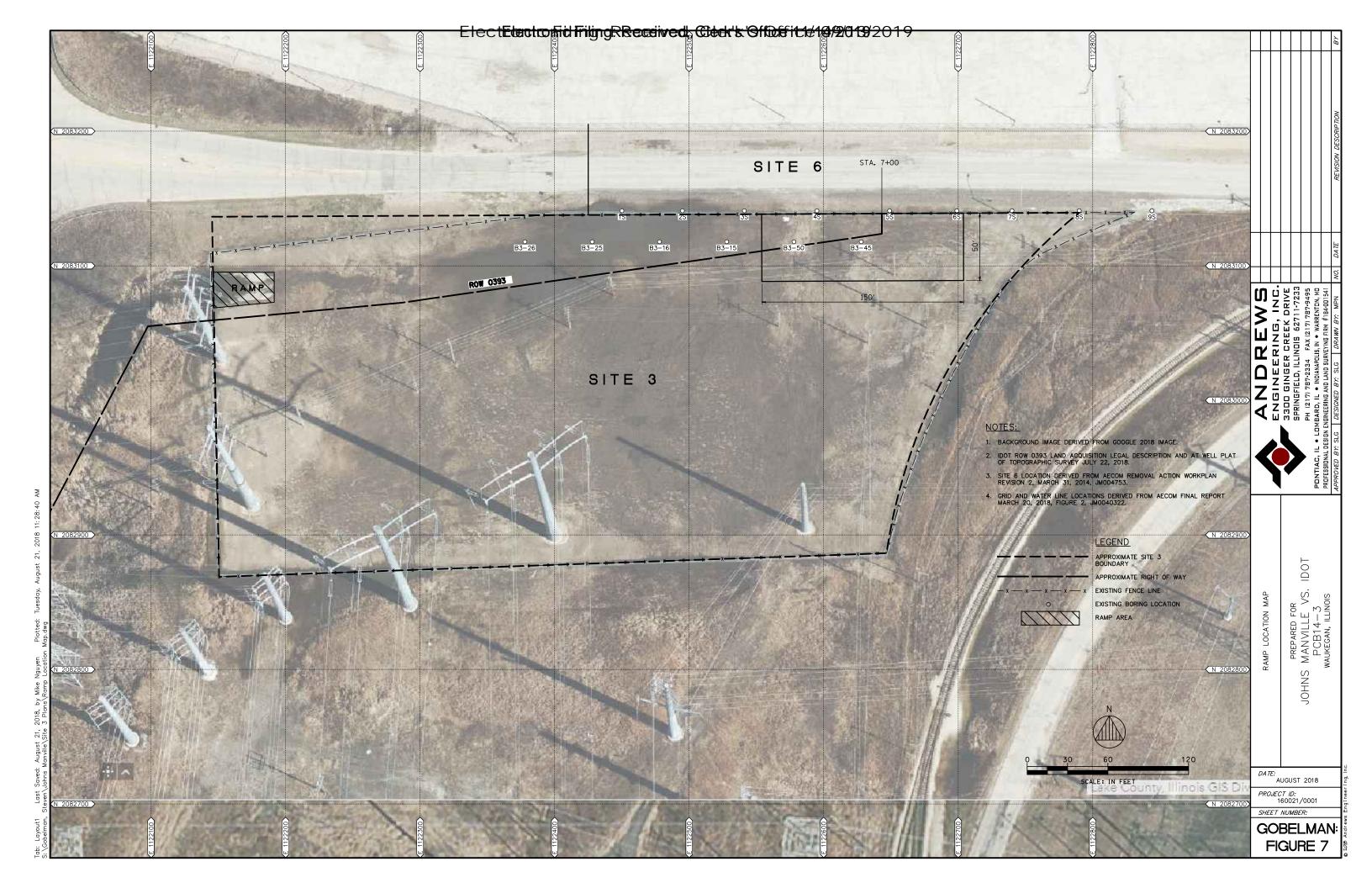
Based on the above table, it is my opinion that \$489,891 of JM's cost (\$5,579,794) incurred on Site 3 and Site 6 are attributable to IDOT in accordance to the IPCB ruling.

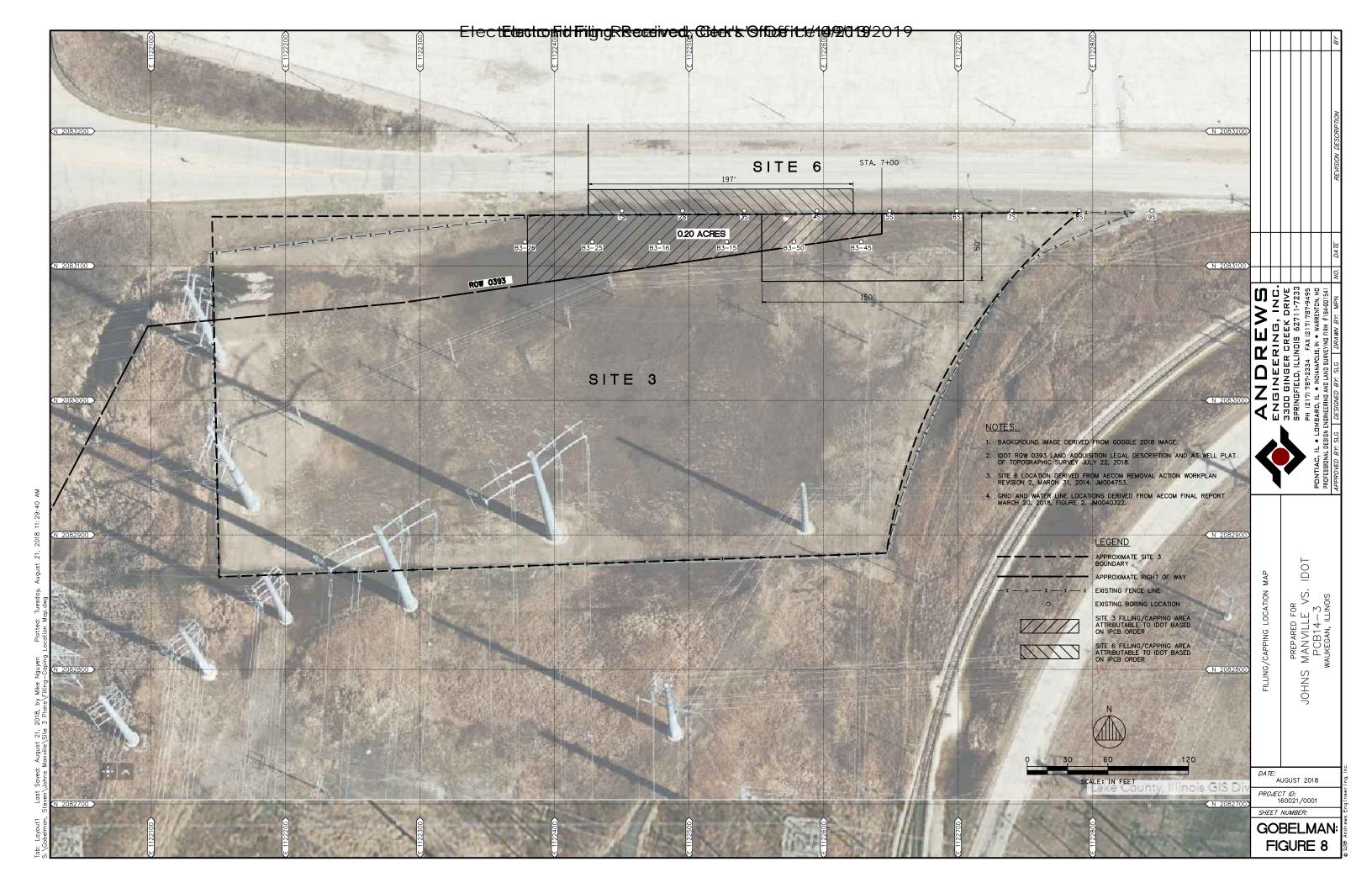
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Work/Cost Type	Task Bucket														
		Nicor Gas		City of Wa	ukegan Water Line	,		AT&T		ComEd					
	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6			
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT	\$ 106,08 0.0		.0% 0.0	\$ 35,867 % 0.0%		0.0%		1.8%	0.0%	0.0%	0.0%	0.0%			
IDOT Attribution	\$	- \$	- \$	- \$	\$ -	\$ -	\$ 4,297	\$ 560	\$ -	\$ -	\$ -	\$ -			
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.0	% 0	.0% 0.0	% 0.0%	0.0%	0.0%	0.0%	\$ 15,000 1.8% \$ 270	0.0%	0.0%	0.0%	0.0%			
	\$	- Þ	- Þ	- \$	- -	Ф -	- -	\$ 270	-	5 -	5 -	5 -			
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.0	% - \$.0% 0.0	% 0.0% - \$	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Construction Services Campanella Base Bid Percentage Attribution to IDOT IDOT Attribution	\$ 106,84 0.0		.0% 0.0	\$ 25,170 % 0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ			
Construction Services Campanella T&M Services Percentage Attribution to IDOT IDOT Attribution	\$ 5,15 0.0		.0% 0.0	% 0.0% - \$	\$ 38,241 0.0% \$ -	_	0.0%	0.0%	\$ 53,548 5.8% \$ 3,106	0.0%	0.0%	0.0%			
Construction Services DMP Percentage Attribution to IDOT IDOT Attribution	0.0	% 0 - \$	\$ 36 .0% 0.0	-	0.0%	0.0%	\$ 0.0%	\$ 0.0%	\$ 45,350 5.8% \$ 2,630	0.0%	0.0%	0.0%			
Construction Services Miscellaneous Percentage Attribution to IDOT IDOT Attribution	0.0	% 0 - \$.0% 0.0	% 0.0% - \$	0.0%	0.0%	\$ 0.0%	\$ 0.0%	\$ 0.0%	0.0%	0.0%	0.0%			
Construction Services Payments to Utilities Percentage Attribution to IDOT IDOT Attribution	0.0	% 0 - \$.0% 0.0	% 0.0%	0.0%	\$ 0.0%	\$ 82,127 16.2% \$ 13,305	1.8%		0.0%	\$ 0.0%	0.0%			
Easement Legal Support Manikas Percentage Attribution to IDOT IDOT Attribution	0.0	% 0 - \$.0% 0.0	% 0.0%	0.0%	5 0.0% \$ -	0.0%	0.0%	\$ 0.0%	0.0%	0.0% \$ -	0.0%			
EPA Oversight Percent Attribution to IDOT IDOT Attribution	0.0	% 0 - \$.0% 0.0	% 0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	0.0%			
Total Costs	\$ 218,09	0 \$	- \$ 36	0 \$ 61,037	\$ 86,674	\$ -	\$ 108,651	\$ 284,266	\$ 98,898	\$ -	\$ -	\$ -			
Total IDOT Attribution	\$	- \$	- \$	- \$	- s -	\$ -	\$ 17,601	\$ 5,117	\$ 5,736	-	-	\$ -			

| 17,601 | \$ 5,117 | \$ 5,736 |
| AT&T |
| Total AT&T Site 3 and Site 6 \$ 392,917 |
| IDOT Attribution \$ 22,718 |
| Percent IDOT attribution 5.8% |
| AT&T IDOT Total \$ 28,454 |

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	Task Bucket														
Work/Cost Type	Utility/Asbestos Containing Material (ACM) Excavation					No	orth Shore Gas (NS	G)		Northeast Excavation		Dewatering			
	Site 3		Site 6	Site 3 and Site 6		Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	135,159 27.3% 36,898	1.7%		\$ 3,977 25.4% \$ 1,010		0.0%	0.0%	0.0% \$ -	\$ 0.0%	
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	\$ 0.0%	0.0%	\$ 10,000 25.4% \$ 2,540	0.0%	0.0%	0.0%	\$ 0.0%	\$ 0.0%	
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	, \$	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	0.0% \$ -	0.0% \$ -	
Construction Services Campanella Base Bid Percentage Attribution to IDOT IDOT Attribution	0.09	\$ % - \$	155,318 3.6% 5,591 \$	0.0%	6 - \$	0.0%	\$ 0.0%	0.0%	\$ 35,957 25.4% \$ 9,133	\$ 0.0%	0.0%	\$ 140,800 15.6% \$ 21,965	23.5%	0.0% \$ -	
Construction Services Campanella T&M Services Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	\$162,678 27.3% 44,411	\$ 0.0%	\$ 22,327 16.7% \$ 3,729		\$ 0.0%	0.0%	\$ 24,325 15.6% \$ 3,795	0.0% \$ -	\$ 17,675 18.6% \$ 3,288	
Construction Services DMP Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	, - \$	0.0% -	\$ 0.0%	\$ 35,830 16.7% \$ 5,984	\$ 0.0%	\$ 0.0%	0.0%	\$ 74,530 15.6% \$ 11,627	0.0%	\$ 21,500 18.6% \$ 3,999	
Construction Services Miscellaneous Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	б - \$	0.0% -	\$ -	0.0%	\$ 0.0%	\$ 0.0%	0.0%	0.0%	0.0%	\$ -	
Construction Services Payments to Utilities Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	34,687 27.3% 9,470	\$ 153,833 1.7% \$ 2,615	0.0%	\$ 0.0%	\$ 0.0%	0.0%	\$ 19,429 15.6% \$ 3,031	23.5%	0.0% \$ -	
Easement Legal Support Manikas Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	0.0%	0.0%	\$ 0.0%	\$ 0.0%	0.0%	0.0%	\$ 0.0%	0.0% \$ -	
EPA Oversight Percent Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	\$ 0.0%	0.0%	\$ 0.0%	\$ 0.0%	0.0%	0.0%	\$ 0.0%	\$ 0.0%	
Total Costs Total IDOT Attribution	\$	- \$ - \$	155,318 \$ 5,591 \$		\$	332,524 90,779		\$ 58,157 \$ 9,712	,	<u> </u>	\$ - \$ -	\$ 259,084 \$ 40,417	·	\$ 39,175 \$ 7,287	

 North Shore Gas (NSG)

 Total NSG Site 3 and Site 6
 567,385
 Total dewater Site 3 and Site 6
 419,671

 IDOT Attribution
 94,772
 IDOT Attribution
 78,155

 Percent IDOT attribution
 16.7%
 Percent IDOT attribution
 18.6%

 NSG IDOT Total
 104,484
 Dewatering IDOT Total
 \$85,442

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Work/Cost Type	Task Bucket															
work/cost Type	Ramp							Filling and Cappin	g		General Site/Site	Preparation		Health and Safety		
		Site 3	S	Site 6 Site	e 3 and Site 6	S	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT	\$	20,880		0.0%	0.0%	ó	0.0%	0.0%	0.0%	\$ 355,534 12.8%	\$ 519,027 5.2%	0.0%	0.0%	0.0%	0.0%	
IDOT Attribution	\$	-	\$	- \$	-	\$	-	\$ -	\$ -	\$ 45,508	\$ 26,989	\$ -	\$	\$ -	\$ -	
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT				0.0%	0.0%	, 0	0.0%	0.0%	0.0%	\$ 70,621 12.8%	\$ 53,250 5.2%	0.0%	0.0%	0.0%	0.0%	
IDOT Attribution	\$	-	\$	- \$	-	\$	-	\$ -	\$ -	\$ 9,039	\$ 2,769	\$ -	\$	\$ -	\$ -	
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	, . \$	0.0%	0.0%	0.0%	\$ 310,903 6.5% \$ 20,209	0.0%	0.0%	0.0%	0.0%	0.0%	
Construction Services Campanella Base Bid Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	328,983 6.5% 21,384	0.0%	0.0%	\$ 138,310 12.8% \$ 17,704	\$ 95,560 5.2% \$ 4,969	0.0%	\$ 0.0%	\$ 0.0%	\$ 77,000 7.5% \$ 5,775	
Construction Services Campanella T&M Services Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	41,721 6.5% 2,712	3.6%	5.3%	0.0%	\$ 37,410 5.2% \$ 1,945		\$ 0.0%	\$ 0.0%	0.0%	
Construction Services DMP Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	55,550 6.5% 3,611	\$ 122,170 3.6% \$ 4,398	5.3%	0.0%	0.0%	\$ 74,300 7.5% \$ 5,573	0.0%	\$ 0.0%	0.0%	
Construction Services Miscellaneous Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	6 • \$	0.0%	\$ 0.0%	0.0%	\$ 57,362 12.8% \$ 7,342	\$ 102,082 5.2% \$ 5,308	0.0%	\$ 0.0%	0.0%	9.0%	
Construction Services Payments to Utilities Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	
Easement Legal Support Manikas Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	
EPA Oversight Percent Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	
Total Costs	\$	20,880	\$	- \$	-	\$	426,254	\$ 310,353	\$ 352,012	\$ 932,730	\$ 807,329	\$ 74,300	\$ -	\$ -	\$ 77,000	
Total IDOT Attribution	\$	-	\$	- \$	-	\$	27,707	\$ 11,173	\$ 18,657	\$ 99,803	\$ 41,981	\$ 5,573	-	-	\$ 5,775	

Filling and Capping
Total Fill and Cap Site 3 and Site 6
IDOT Attribution General Site/Site Preparation
Total Construction Cost
Total IDOT Attribution Site 3/6 \$ 548,602 \$ 41,391 Site 3 \$ 1,476,454 Site 6 \$ 1,232,059 \$ 63,612 736,607 \$ 38,879 \$ 189,187 Percent IDOT attribution Fill and Cap IDOT Total 5.3% Percent IDOT Attribution 12.8% 5.2% 7.5% 57,536

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Work/Cost Type			Task E		Total			Total Site 3			
	EPA Oversight			Legal Support Services			Total			and Site 6 Costs	
	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6		
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT	0.0%		0.0%	0.0%		% 0.0%	\$ 684,027 \$	679,593 \$	- \$	1,363,620	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 87,714 \$	28,927 \$	- \$	116,64	
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	% 0.0%	\$ 80,621 \$	68,250 \$	- \$	148,871	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 11,579 \$	3,039 \$	- \$	14,61	
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	% 0.0%	\$ 310,903 \$	- \$	- \$	310,903	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 20,209 \$	- \$	- \$	20,209	
Construction Services Campanella Base Bid Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	% 0.0%	\$ 776,068 \$	410,128 \$	77,000 \$	1,263,196	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 70,185 \$	47,984 \$	5,775 \$	123,945	
Construction Services Campanella T&M Services Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	6 0.0%	\$ 233,880 \$	263,834 \$	325,412 \$	823,126	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 50,918 \$	8,720 \$	22,411 \$	82,048	
Construction Services DMP Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	% 0.0%	\$ 130,080 \$	122,170 \$	297,490 \$	549,740	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 15,237 \$	4,398 \$	24,553 \$	44,189	
Construction Services Miscellaneous Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	6 0.0%	\$ 57,362 \$	102,082 \$	- \$	159,444	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 7,342 \$	5,308 \$	- \$	12,651	
Construction Services Payments to Utilities Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	% 0.0%	\$ 136,243 \$	393,331 \$	- \$	529,574	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ -	\$ 25,805 \$	7,216 \$	- \$	33,02	
Easement Legal Support Manikas Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.09	\$ 71,840 % 8.5%	\$ - \$	- \$	71,840 \$	71,840	
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$	- \$ 6,106	- \$	- \$	6,106 \$	6,10	
EPA Oversight	\$ 233,805						\$ 233,805 \$	125,675 \$	- \$	359,480	
Percent Attribution to IDOT IDOT Attribution	12.8% \$ 29,927	5.2% \$ 6,535		0.0%	0.09	% 0.0% - \$ -	\$ 29,927 \$	6,535 \$	- \$	36,462	
Total Costs	\$ 233,805	\$ 125,675	\$ -	\$ -	\$	- \$ 71,840	\$ 2,642,989 \$	2,165,063 \$	771,742 \$	5,579,794	
Total IDOT Attribution	\$ 29,927	\$ 6,535	s -	s -	\$	\$ 6,106	\$ 318,917 \$	112,128 \$	58,845 \$	489,890	

 Manikas Support Site 3/6
 Site 3
 Site 6
 Site 3 and 6
 Total

 Total costs for utility work
 \$ 720,302
 \$ 761,119
 \$ 157,415
 \$ 1,638,836

 Total IDOT Attribution
 \$ 108,381
 \$ 14,701
 \$ 15,448
 \$ 138,530

 Percent IDOT Attribution
 \$ 8.5%

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TABLE

ElectEderotronfiid FriligngReceived, Cleak'k 'Offloffi tale 10/2/01392019

Appendix A

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- 1. Expert Report of Douglas G. Dorgan, Jr On Damages Attributable to IDOT, Johns Manville vs Illinois Department of Transportation, prepared by Weaver Consultants Group, dated June 13, 2018.
- 2. Board, Illinois Pollution Control. Interim Opinion and Order of the Board, December 15, 2016.
- 3. **AECOM.** Final Report, Southwestern Site Area, Site 3, Site 4/5, and 6, Waukegan, Illinois, March 20, 2018.
- 4. Grant of Public Highway, August 3, 1971.
- 5. State of Illinois Department of Public Works and Buildings, Division of Highways, Plans for Proposed Federal Aid Highway, F.A. Route 42 Section 8-HB & 8-VB, Lake County, Contract #28266. 1971.
- 6. Surface and Subsurface Characterization Site 2 and Site 3 Former Johns Manville Manufacturing Facility Waukegan Illinois, Volume 1, Appendix A Appendix K, prepared for Johns Manville. s.l.: prepared by ELM Consultants, LLC., December 10, 1999.
- 7. **AECOM.** Removal Action Work Plan, Revision 2, Southwestern Site Area Site 3, 4/5, and 6, Johns Manville Site, Waukegan, Illinois. March 31, 2014.
- 8. Engineering Evaluation/Cost Analysis (EE/CA) Southwestern Site Area Sites 3, 4/5, and 6: Revision 4, prepared for Johns Manville and Commonwealth Edison Company. s.l.: prepared by ARCADIS U.S., Inc., April 4, 2011.

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Appendix B

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Years of Experience

IL Dept. of Transportation

Andrews

3

Steven L. Gobelman, P.E., L.P.G. Project Director

22

8

Andrews Engineering, Inc. 3300 Ginger Creek Drive Springfield. Illinois 62711

(217) 787-2334

IL Environmental Protection Agency

Education

MS/Geological Engineering University of Alaska-Fairbanks

BS/Geological Engineering University of Missouri-Rolla

Undergraduate work/Engineering Belleville Area College Belleville, Illinois

Licenses

Professional Engineer – IL, IN Licensed Professional Geologist – IL

Certification

OSHA Hazardous Waste Site Worker Certification (40 hr)

OSHA Hazardous Waste Worker Refresher (8 hr)

MSHA Part 48

Confined Space Certified

<u>Awards</u>

1998 IDOT Central Office Engineer of the Year

Affiliations

Transportation Research Board Member, ADC60 – Committee on Resource Conservation and Recovery

Publications

"Sublimation of Reconstituted Frozen Silts", MS Thesis, University of Alaska-Fairbanks, May 1985.

Professional Experience

Andrews Engineering, Inc.

Springfield, Illinois

August 2015 to Present

Project Director. Responsible for providing technical expertise to industrial and government clients in various environmental issues including: CERCLA, RCRA, TSCA, remediation technologies, and transportation. Review and prepare various reports on risk assessments, remediation work plans, quality assurance/quality control plans, and remedial investigation and feasibility studies.

Illinois Department of Transportation

Springfield, Illinois

September 2014 to July 2015

Technical Manager. Responsible for providing highly specialized technical expertise department wide, for conducting assessments and investigations of special waste, and when required remediation. Review and prepare risk assessments, work plans, quality assurance/quality control plans, recommend further action, NEPA documents, and coordinate various contract activities with districts, central office bureaus, and regulatory agencies.

Illinois Department of Transportation

Springfield, Illinois

September 2013 to September 2014

Technical Manager. Acting Roadside Maintenance Manager. Responsible for policies for operation and maintenance of highway rest areas statewide and responsible for reviewing all rest area plans and making recommendations regarding their design and construction. Responsible for administrative rest area maintenance contracts. Develop policies for turf and plan management for highway rights-of-way statewide (items included are mowing policy, herbicide, plant varieties and diseases, fertilization, and erosion control measures). Technical expert on hazardous waste related to pesticide/herbicide management.

Illinois Department of Transportation

Springfield, Illinois

September 1993 to September 2013

Technical Manager. Responsible for providing highly specialized technical expertise departmentwide, for conducting assessments and investigations of special waste, and when required remediation. Review and prepare risk assessments, work plans, quality assurance/quality control plans, recommend further action, NEPA documents, and coordinate various contract activities with districts, central office bureaus, and regulatory agencies.

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Illinois Environment Protection Agency

Springfield, Illinois

March 1992 to September 1993

Lead Worker. Project Manager in the Bureau of Land, Division of Remediation Management, Remedial Project Management Section, Remediation Engineering Sub-Unit. Section's technical expert on geology, hydrogeology, and engineering. Conduct engineering and technical research on problems associated with cleanups conducted in the Section. Conduct public meetings and provide engineering and technical details to public information personnel for media and citizen inquiries.

Illinois Environment Protection Agency Springfield, Illinois

May 1988 - March 1992

Environment Protection Engineer. Project Manager in the Bureau of Land, Division of Remediation Management, Remedial Project Management Section, State Sites Unit. Unit's technical expert on geology, hydrogeology, and engineering. Perform duties associated with State site cleanup projects, including voluntary cleanup actions negotiated with industry, which are highly technical in nature and include complex engineering, geology, and hydrogeologic problems as well as sensitive issues concerning toxic environmental contaminants and their public health effects. Manage contracts with engineering and cleanup firms for remedial investigations (RI), feasibility studies (FS), design, and cleanup projects. Perform RI/FS that include sampling of groundwater, soil, and hazardous waste.

Illinois Environment Protection Agency Springfield, Illinois

November 1985-April 1988

Environmental Protection Engineer. Permit Reviewer in the Bureau of Land, Division of Land Pollution Control, Permit Section. Performed a variety of geology, hydrogeologic, and engineering functions pertaining to permit review of underground injection control (UIC) permits, RCRA closures, and solid waste permit and closure applications. Determine the feasibility of the application based on technical/engineering, geology, hydrogeologic data, and financial assurance. Based on the feasibility made recommendations for approval or denial. Worked with computer modeling of pollutant transport in groundwater to determine the extent of groundwater contamination.

Presentations

"Managing 'Uncontaminated Soil' and Special Waste through General Construction Contracts", Presented Various IDOT Districts, Project Implementation Annual Meeting, and Project Development Annual Meeting, 2012 and 2013.

"Acquiring Liability and Avoiding it at the Same Time", Presented to the Transportation Research Board's ADC60 Summer Meeting, Portland, Oregon, July 27, 2011.

"IDOT Approach to EMIS", Presented to the Transportation Research Board's ADC60 Summer Meeting, Baltimore, Maryland, June 17, 2008.

"Creating and Implementing Programs for Environmental Compliance Audits", Panel Discussion, Presented to the Transportation Research Board's ADC60 Summer Meeting, Ft Worth, Texas, July 9, 2007.

"IDOT's Management of Waste", Presented to Various IDOT Districts, July 2006.

"IDOT's Management of Waste", Presented at the Illinois Environmental Protection Agency RCRA Retreat, September 30, 2004.

"Phase II Process", Presented at IDOT's Annual Program Development Meeting, September 2003.

"Contamination Management Bid Items in Construction Contracts, A Good Idea?" Panel Discussion, Presented to the Transportation Research Board's A1F07 Summer Meeting, Key West, Florida, July 9, 2001.

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"On-Site Management of Potentially Contaminated Soil as Construction Fill", Presented to the Transportation Research Board's National Meeting, Washington, DC, January 13, 1998.

"On-Site Management of Potentially Contaminated Soil as Construction Fill", Presented at Brownfield '97, Kansas City, Missouri, September 4, 1997.

"On-Site Management of Potentially Contaminated Soil as Construction Fill", Presented to the Transportation Research Board's A1F07 Summer Meeting, Asheville, North Carolina, July 28, 1997.

"IEPA's Procedure on Determining How Clean is Clean", Presented to the AEG-North Central Section, March 16, 1993.

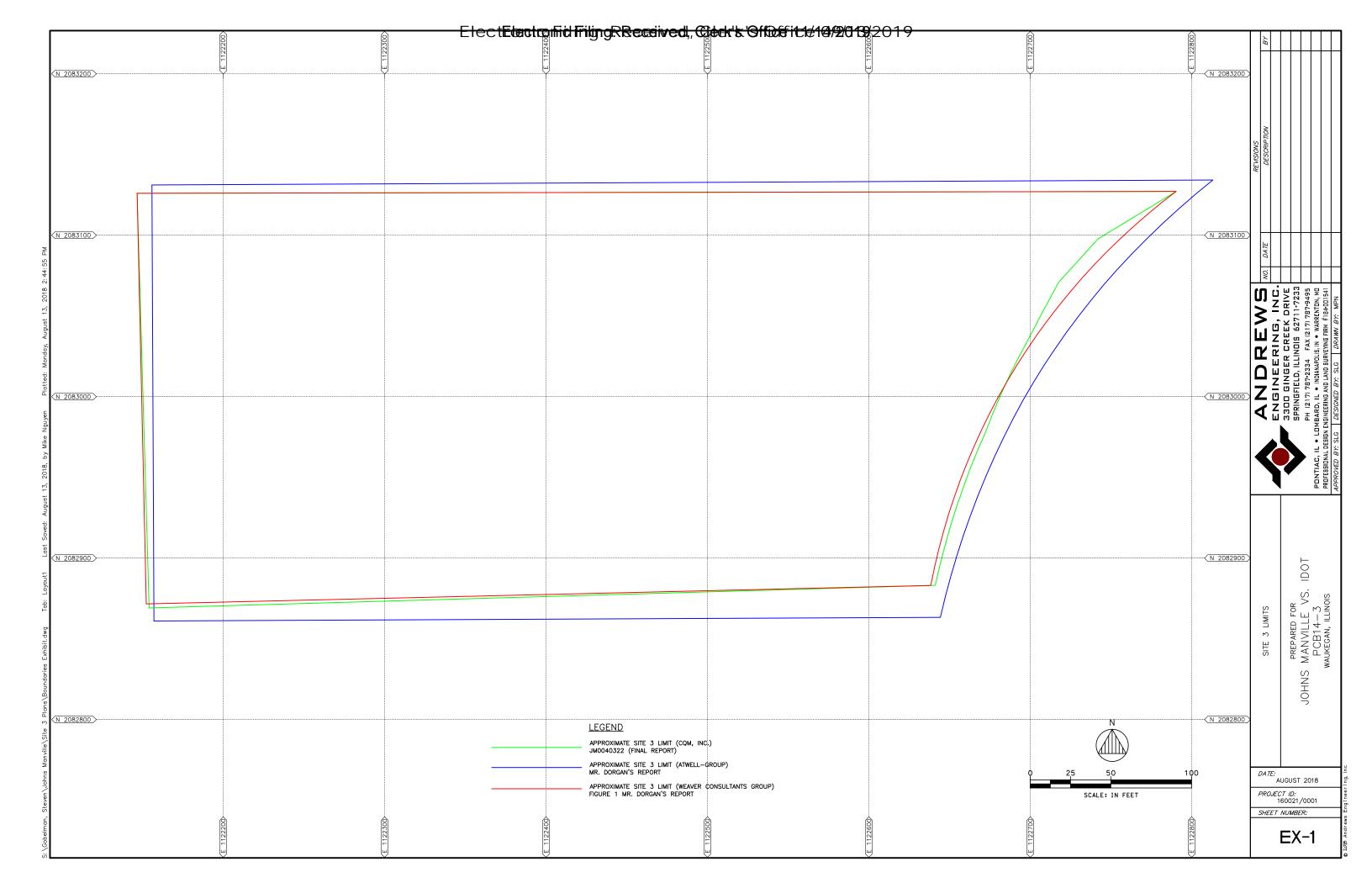
"Site Safety Plans - An Agency Viewpoint", Presented at HazMat '92 - Chicago, March 1992. "Illinois EPA Cleanup Program", Presented at Illinois Environmental Regulation Conference, October 1991.

"Implementation of Mobile Incineration at the Paxton Avenue Lagoons Site, Chicago, Illinois", Presented at the Environmental Management Exposition, October 1990.

"Illinois Environmental Protection Agency's Procedure on Setting Cleanup Objectives", Presented at Federation of Environmental Technologist, Illinois Environmental News and Views, May 1990.

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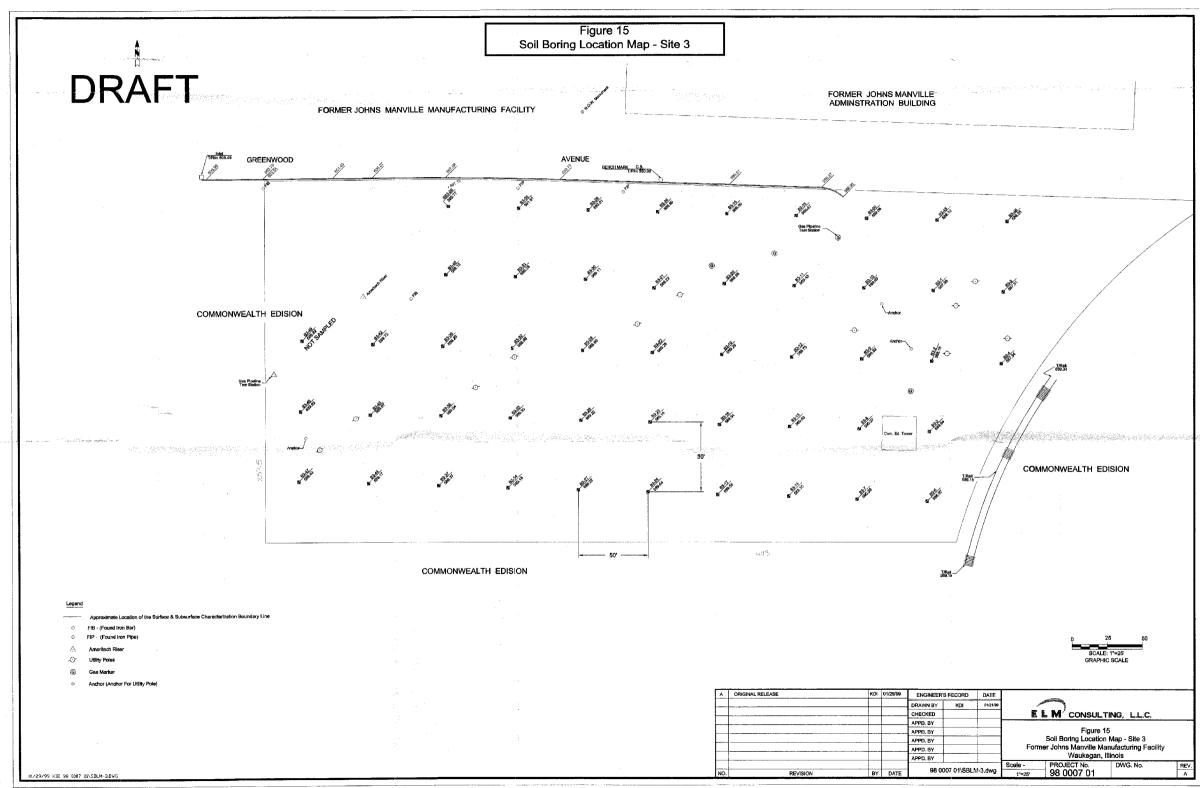
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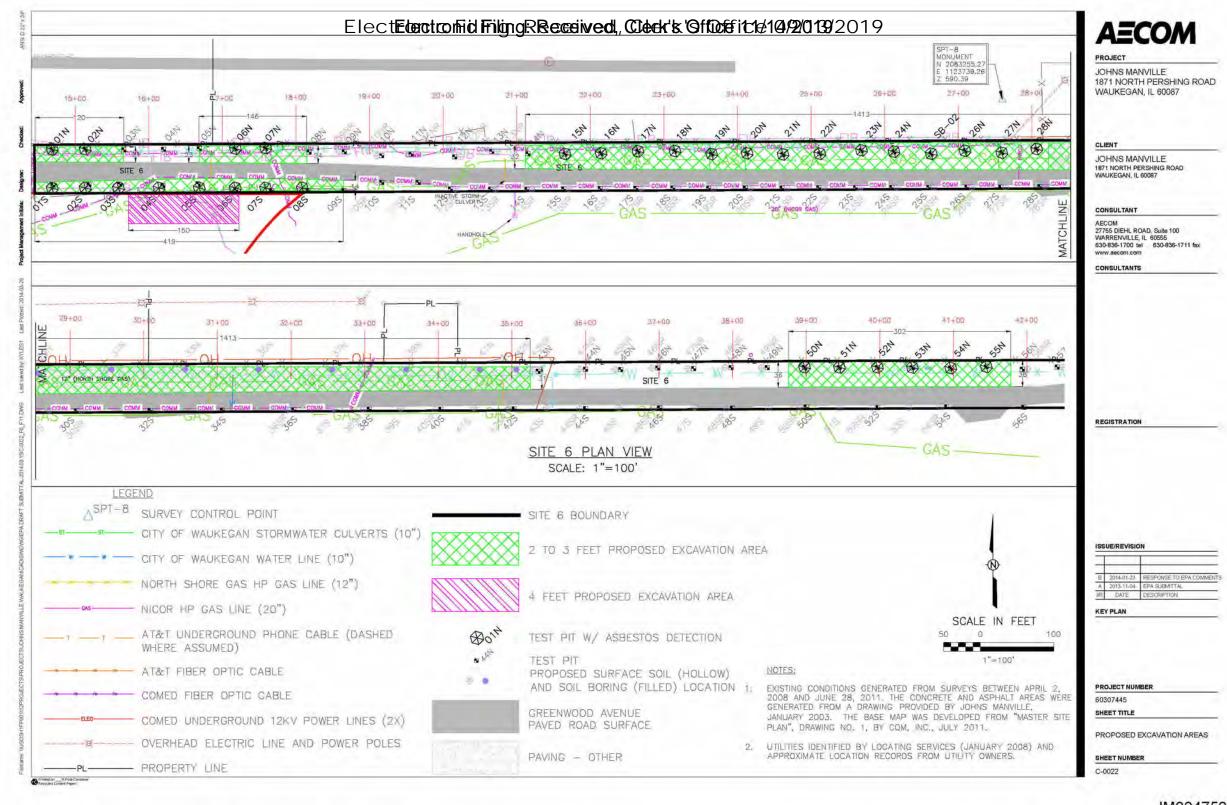


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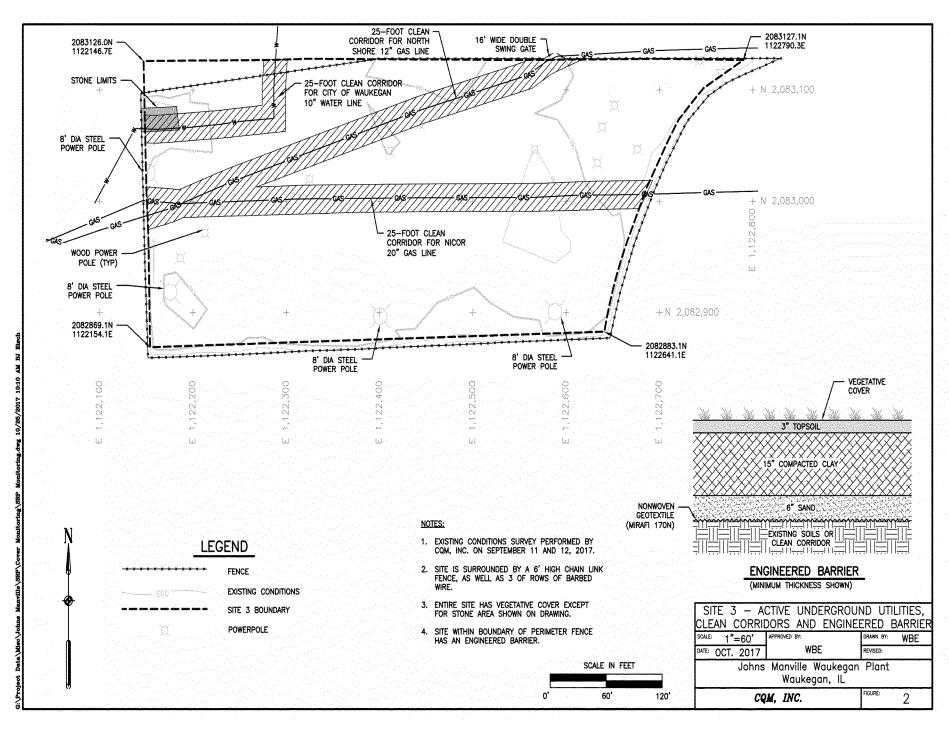
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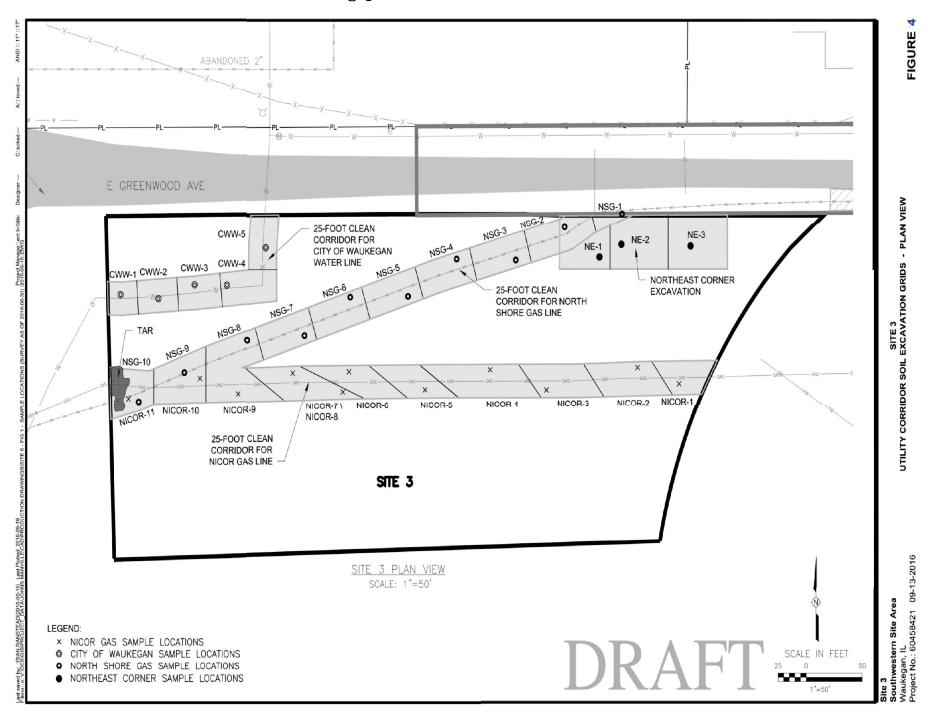




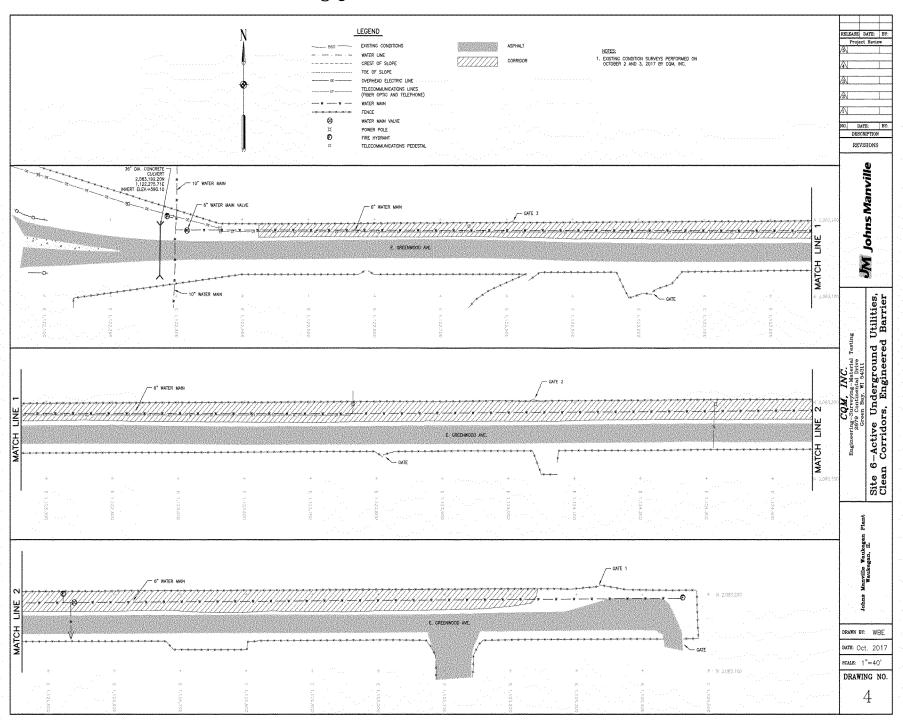
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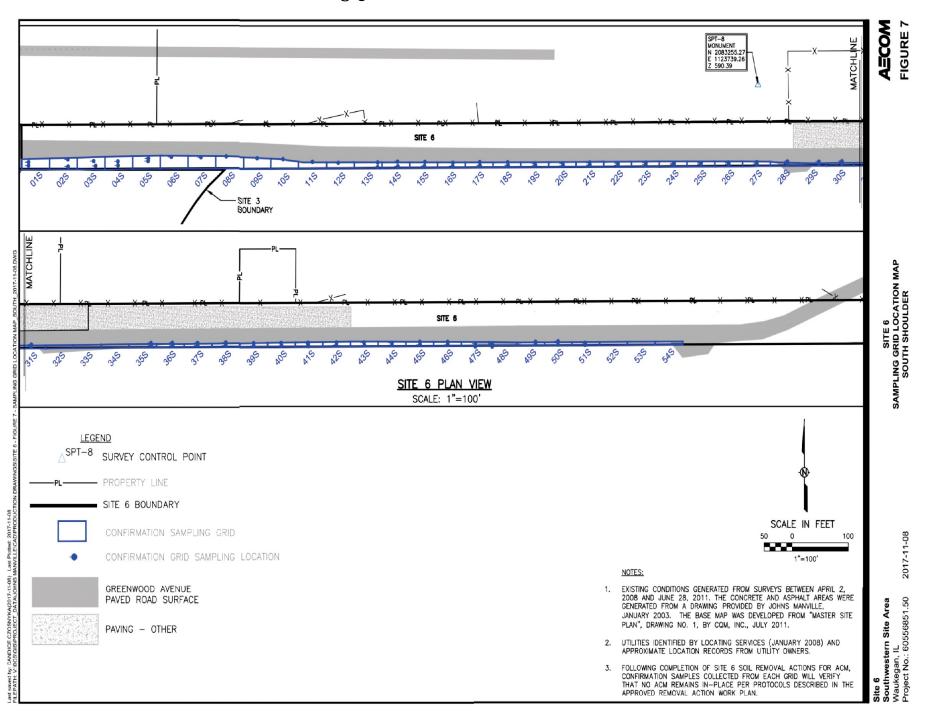
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Appendix E

FA. Ria 42 Section 8 LAKE Co.

GRANT FOR PUBLIC HIGHWAY

THIS INDENTURE WITNESSETH: That Grantor, COMMONWEALTH EDISON

COMPANY, an Illinois Corporation, for and in consideration of the sum

of Ten and No/100 Dollars (\$10.00) and other good and valuable consideration,

receipt of which is hereby acknowledged, paid by and for the State of

Illinois, Grantee herein, acting by and through the Department of Public

Works and Buildings, hereby grants, but without warranty, subject to the

reservations, conditions and provisions hereinafter contained, unto Grantee

the right to use for highway purposes only, the following tract of land:

Parcel No. 0392 PART A

A part of the Westerly 100 feet of all that part of the Southwest Quarter of the Southwest Quarter of Section 10 in Township 45 North, Range 12 East of the Third Principal Meridian, lying Easterly of the Right of Way of the Chicago and North Western Railway Company, in Lake County, Illinois, described as follows: Beginning at the intersection of the Easterly Right-of-Way line of the Chicago and North Western Railway Company and the South line of the Southwest Quarter of said Section 10; thence North 6° 39' 32" East 305.30 feet, as measured along said Easterly Right of Way; thence North 89° 44' 18" East 35.00 feet; thence North 11° 09' 06" East 194.74 feet; thence North 15° 11' 23" East 202.24 feet; thence North 6° 39' 33" East 101.37 feet; thence South 83° 20' 30" East 20.00 feet to a point on a line 100.00 feet Easterly of the Easterly Right of Way line of the Chicago and North Western Railway Company; thence South 6° 39' 32" West 792.89 feet to a point on the South line of the Southwest Quarter of said Section 10; thence South 89° 44' 18" West 100.73 feet, as measured along the South line of the Southwest Quarter of said Section 10, to the Point of Beginning.

PART B

A part of the Westerly 100 feet of all that part of the West Half of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian, lying Easterly of the Right of Way of the Chicago and North Western Railway Company, in Lake County, Illinois, described as follows: Beginning at the intersection of the Easterly Right of Way line of the Chicago and North Western Railway Company and the South line of Greenwood Avenue, said South line of Greenwood Avenue being 66 feet South of and parallel to the North line of the Northwest Quarter of said Section 15; thence South 6° 39' 32" West 90.0 feet, as measured along the Easterly Right of Way of the Chicago and North Western Railway Company; thence South 13° 02' 59" East, 148.26 feet; thence South 6° 39' 32" West 100.00 feet; thence South 2° 48" 12" East 304.14 feet to a point on the Westerly line of Sand Street; thence North 6° 39' 32" East 641.72 feet along the Westerly line of Sand Street to a point on the South line of Greenwood Ayenue; thence South 89° 44' 16" West,

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100.73 feet along the South line of the Greenwood Avenue, to the Point of Beginning.

PARCEL NO. E392

A part of the Westerly 100 feet of all that part of the Southwest Quarter of the Southwest Quarter of Section 10, Township 45 North, Range 12 East of the Third Principal Meridian, lying Easterly of the Right of Way of the Chicago and North Western Railway Company, in Lake County, Illinois, described as follows: Commencing at the intersection of the Easterly Right of Way of the Chicago and North Western Railway Company and the North line of Greenwood Ayenue, said North line of Greenwood Avenue being 40 feet North of and parallel to the South line of the Southwest Quarter of the Southwest Quarter of said Section 10; thence North 6° 39' 32" East 801.34 feet, as measured along the Easterly Right of Way of the Chicago and North Western Railway Company, to the Point of Beginning; thence South 83° 21' 08" East 100.00 feet; thence North 6° 39' 32" East 120.00 feet; thence North 83° 21' 08" West 100.00 feet to a point on the Easterly Right of Way of the Chicago and North Western Railway Company; thence South 6° 39' 32" West 120.00 feet, as measured along said Easterly Right of Way, to the Point of Beginning.

Parcel No. 0393

A part of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Beginning at the intersection of the Easterly line of Sand Street and the South line of Greenwood Avenue thence North 89° 44' 17" East 643.23 feet as measured along the South line of Greenwood Avenue; thence South 0° 15' 49" East 15.0 feet; thence South 81° 54' 31" West 403.76 feet; thence South 89° 44' 17" West 140.0 feet; thence South 27° 50' 01" West 185.24 feet; thence South 0° 06' 25" East 118.83 feet; thence South 14° 42' 11" West 414.48 feet to a point on the Easterly line of Sand Street; thence North 6° 39' 32" East 758.19 feet as measured along the Easterly line of Sand Street to the Point of Beginning.

Parcel No. E393

A part of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the South line of Greenwood Avenue and the East line of Sand Street thence North 89° 44' 17" East 643.23 feet; thence South 0° 15' 49" East 15.00 feet to the Point of Beginning; thence South 0° 15' 49" East 15.00 feet; thence South 57° 56' 15" West 435.99 feet; thence South 23° 33' 27" West 247.70 feet; thence South 34° 53' 13" West 336.16 feet; thence South 26° 17' 09" West 201.25 feet; thence North 83° 26' 33" East 3.40 feet to a point on the East line of Sand Street; thence North 6° 39' 32" East 189.57 feet as measured along the East line of Sand Street; thence North 14° 42' 11" East 175.00 feet; thence North 41° 26' 36" East 141.13 feet; thence North 17° 14' 26" East 92.57 feet; thence North 1° 03' 41" East 280.32 feet; thence North 27° 50' 01" East 45.00 feet; thence North 89° 44' 17" East 45.00 feet; thence South 1° 00' 09" East 198.14 feet; thence North 53° 41' 32" East 388.50 feet; thence North 81° 54' 31" East 180.00 feet to the point of Beginning.

Parcel No. 0394

A part of the East 300 feet of the South half of the Southeast Quarter of Section 9 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as

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follows: Beginning at the Southeast Corner of the Southeast Quarter of said Section 9 thence South 89° 45' 04" West 300.02 feet, as measured along the South line of the Southeast Quarter of said Section 9 thence North 0° 25' 40" East 105.61 feet; thence South 81° 40' 52" East 37.63 feet; thence South 0° 14' 56" East 20.00 feet; thence North 89° 45' 04" East 46.00 feet; thence North 0° 14' 56" West 20.00 feet; thence North 89° 45' 04" East 61.00 feet; thence North 0° 14' 52" West 120.00 feet; thence North 89° 45' 04" East 157.16 feet to a point on the East line of the South half of the Southeast Quarter of said Section 9; thence South 0° 25' 40" West 220.00 feet as measured along the said East line to the point of Beginning.

Parcel No. E394 PART A

A part of the East 300 feet of the South half of the Southeast Quarter of Section 9 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the East line of the South half of the Southeast Quarter of said Section 9 and the North line of Greenwood Avenue, said North line of Greenwood Avenue being 40 feet North of the South line of the South half of the Southeast Quarter of said Section 9; thence North 0° 25' 40" East 355.00 feet, as measured along the said East line to the point of Beginning; thence North 0°25' 40" East 180.00 feet, as measured along said East line; thence South 40° 20' 50" West 467.50 feet to a point on a line 300 feet West of the East line of the South half of the Southeast Quarter of said Section 9; thence South 0° 25' 40" West 114.39 feet; thence South 81° 40' 52" East 37.63 feet; thence North 41° 28' 28" East 160.78 feet; thence North 42° 03' 04" East 236.58 feet to the Point of Beginning.

Parcel No. E394 PART B

A part of the East 300 feet of the South half of the Southeast Quarter of Section 9 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Beginning at the intersection of the East line of the South half of the Southeast Quarter of said Section 9 and the North line of Greenwood Avenue, said North line of Greenwood Avenue being 40 feet North of the South line of the South half of the Southeast Quarter of said Section 9: thence South 89° 45' 04" West 300.02 feet, as measured along the North line of Greenwood Avenue; thence North 0° 25' 40" East 65.61 feet; thence South 81° 40' 52" East 37.63 feet to the Point of Beginning; thence South 0° 14' 56" East 20.00 feet; thence North 89° 45' 04" East 46.00 feet; thence North 0° 14' 56" West 20.00 feet; thence South 89° 45' 04" West 46.00 feet of the point of Beginning.

Parcel No. E395

A part of the Northwest Quarter of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the South line of Greenwood Avenue, said South line being 40 feet South of the North line of the Northwest Quarter of the Northwest Quarter of said Section 15, and the Westerly Right of Way of the Chicago and North Western Railway Company; thence South 89° 45' 04" West 100.00 feet; thence South 0° 14' 56" East 75.00 feet to the point of Beginning; thence South 0° 15' 44" East 205.00 feet; thence South 89° 44' 15" West 91.00 feet; thence North 0° 15' 45" West 140.51 feet; thence North 89° 46' 04" East 24.98 feet; thence

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North 0° 14' 56" West 64.49 feet; thence North 89° 45' 04" East 66.00 feet to the Point of Beginning.

Parcel No. E395 PART B

A part of Lot 1 of School Trustee's Subdivision of Section 16 in Township 45 North, Range 12 East of the Third Principal Meridian, in Lake County, Illinois, described as follows: Commencing at the Southwest Corner of Lot 6 in Russell H. Edward's Business Sites, being a Subdivision of said Lot 1 in School Trustee's Subdivision thence North 88° 55' 20" East 77.28 feet, as measured along the South line of said Lot 6, to the Point of Beginning; thence South 0° 14' 56" East 36.25 feet; thence North 89° 45' 04" East 100.00 feet; thence North 0° 14' 56" West 37.69 feet to a point on the South line of Lot 7 in said Russell H. Edward's Business Sites; thence South 88° 55' 20" West 100.00 feet, as measured along the South lines of Lots 6 and 7 in said Fussell H. Edward's Business Sites; the the Point of Beginning.

Parcel No. 0395 PART A

A part of the Northwest Quarter of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the 3rd Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the South line of Greenwood Avenue and the Westerly Right of Way of the Chicago and North Western Railway Company thence South 89° 45' 04" West 100.00 feet, as measured along the South line of Greenwood Avenue; thence South 0° 14' 56" East 75.00 feet; thence South 89° 45' 04" West 66.00 feet along a line 75.00 feet South of and parallel to the said South line of Greenwood Avenue; thence North 0° 14' 56" West 75.00 feet to a point on the south line of Greenwood Avenue; thence North 89° 45' 04" East 66.00 feet, as measured along the said South line of Greenwood, to the Point of Beginning.

Said tact of land herein described contains 0.114 Acres, more or less.

Parcel No. 0395 PART B

A part of Lot 1 in School Trustee's Subdivision of Section 16 and a part of the South 300 feet of the North 479.5 feet of that part of Northwest Quarter of the Northwest Quarter of Section 15, lying West of the Westerly line of the right of way of the Chicago and North Western Railway Company, all in Township 45 North, Range 12 East of the 3rd Principal Meridian in Lake County, Illinois, described as follows: Beginning at the intersection of the East line of the Northeast Quarter of said Section 16 and the South line of Lot 9 in Russell H. Edward's Business Sites, being a part of Lot 1 in said School Trustee's Subdivision and a part of the Northwest Quarter of the Northwest Quarter of said Section 15; thence South 89° 55' 20" West 141.77 feet, as measured along the South line of Lots 9 and 8 in said Russell H. Edward's Business Sites; thence South 0° 11' 03" East 52.27 feet; thence South 2° 37' 41" West 200.25 feet; thence South 5° 56' 41" East 48.05 feet; thence North 89° 09' 38" East 310.24 feet; thence North 0° 14' 03" West 144.53 feet; thence North 5° 56' 41" West 100.50 feet; thence North 3° 28' 56" West 54.52 feet to a point on the South line of Lot 10 in said Russell H. Edward's Business Sites; thence South 89° 44° 17" West 150.11 feet, as measured along the South line of Lots 10 and 9 of said Russell H. Edward's Business Sites to the point of beginning.

Said tract of land herein described contains 2.106 acres, more or less.

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Parcel No. 0399

A part of Lots 6, 7, 8 and 9 in Russell H. Edward's Business Sites, being a Subdivision of Lot 1 in School Trustee's Subdivision of Section 16 in Township 45 North, Range 12 East of the Third Principal Meridian, reference being made to the Plan thereof recorded in the Recorder's Office of Lake County, Illinois, in Book of Plats 31 on Page 102; described as follows: Beginning at the intersection of the South line of Greenwood Avenue and the East line of the Northeast Quarter of said Section 16; thence south 89° 45' 04" West 311.83 feet along the North lines of Lots 9, 8, 7 and 6 to a point 49.67 feet East of the Northwest corner of said Lot 6; thence South 14° 53' 01" West 46.61 feet; thence South 80° 47' 07" East 30.47 feet; thence North 89° 45' 07" East 150.00 feet; thence south 0° 14' 56" East 91.54 feet to a point on the South line of said Lot 8; thence North 88° 55' 20" East 141.77 feet along the South lines of said Lots 8 and 9 to a point on the East line of the Northeast Quarter of said Section 16; thence North 0° 38' 46" East 139.51 feet along the East line of the Northeast Quarter of said Section 16 to the Point of Beginning.

Parcel No. E399

A part of Lots 6 and 7 in Russell H. Edward's Business Sites, being a part of Lot 1 in School Trustee's Subdivision of Section 16 in Township 45 North, Range 12 East of the Third Principal Meridian, according to the Plat thereof recorded in Book 31 of Plats, Page 102, in Lake County, Illinois, described as follows: Commencing at the Southwest Corner of said Lot 6 thence North 88° 55' 20" East 77.28 feet, as measured along the South line of said Lot 6, to the Point of Beginning; thence North 0° 14' 56" West 93.71 feet; thence North 89° 45' 07" East 100.00 feet; thence South 0° 14' 56" East 92.27 feet to a point on the South line of said Lot 7; thence South 88° 55' 20" West 100.00 feet, as measured along the South line of Lots 6 and 7 to the Point of Beginning.

Parcel No. 0400

A part of Lots 1 and 2 in School Trustee's Subdivision of Section 16 and a part of the Northwest Quarter of the Northwest Quarter of Section 15 all in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of South line of the Northwest Quarter of the Northwest Quarter of said Section 15 and the Westerly Right of Way of the Chicago and North Western Railway Company thence South 89° 46' 07" West 204.00 feet as measured along the South line of the Northwest Quarter of the Northwest Quarter of said Section 15 to the Point of Beginning; thence North 0° 13' 53" West 204.00 feet; thence North 89° 46' 07" East 73.17 feet; thence North 8° 32' 41" East 82.02 feet; thence North 3° 34' 48" East 150.33 feet; thence North 1° 24'09" East 350.14 feet; thence North 0° 14' 03" West 55.46 feet; thence South 89° 09' 38" West 310.24 feet; thence South 5° 56' 41" East 253.45 feet; thence South 0° 14' 03" East 300.00 feet; thence South 2° 50' 26" East 100.05 feet; thence South 0° 53' 54" East 185.11 feet to a point on the North line of Lot 3 in said School Trustee's Subdivision; thence North 89° 46' 07" East 172.61 feet, as measured along the North line of Lot 3 in said School Trustee's Subdivision and along the South line of the Northwest Quarter of the Northwest Quarter of said Section 15 to the Point of Beginning.

as shown on Exhibit "A", attached hereto and made a part hereof.

Grantor hereby reserves unto itself, its successors and assigns,

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the right to install, operate, maintain renew and remove its or their facilities upon, over and under the surface of said described tracts of land, and to make such other and futher use of said tracts of land, as it or they shall see fit, insofar as is compatible with the use of said tracts of land for highway purposes.

Grantor hereby further reserves the right to trim from time to time such trees, saplings, and bushes as may reasonably be required in the operation and maintenance of said facilities of Grantor, and Grantee agrees not to plant any trees on or near said described tracts of land which can grow into said facilities of Grantor.

This grant is subject to two (2) roadways reserved in deed dated June 8, 1923, recorded on June 13, 1923, as Document #225388, an easement dated June 18, 1936 to the City of Waukegan for a 10-inch sanitary sewer, and an easement dated August 14, 1954, to North Shore Sanitary District for a 39-inch interceptor sanitary sewer. There may be other utility lines, mains, pipelines or other underground facilities in this area, however, the exact location and users are not known to Grantor but this grant is expressly made subject to such lines.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on this $3\frac{20}{}$ day of August, A.D. 1971.

COMMONWEALTH EDISON COMPANY

TTEST:

Assistant Secretary

1517501

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STATE OF ILLINOIS)

COUNTY OF COOK)

I, William E.. Briars, Jr., a Notary Public, in and for said County and in the State aforesaid, DO HEREBY CERTIFY that GLEN W. BEEMAN ASSISTANT Secretary, respectivly, of COMMONWEALTH EDISON COMPANY, a corporation, and also known to me to be the persons whose names are subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that as such Vice President and Assistant Secretary respectively, they signed, sealed and delivered the said instrument as the free and voluntary act of said corporation, for the uses and purposes therein set forth, and that they were duly authorized to execute the same by the board of directors of said corporation.

Given under my hand and notarial seal this 3 20 day of AUGUST , A.D. 1971.

Notary Public

My Commission Expires AUGUST 3, 1974

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EILED FOR RECORD IN RECORDERS
OFFICE LAKE COUNTY, ILLINOIS

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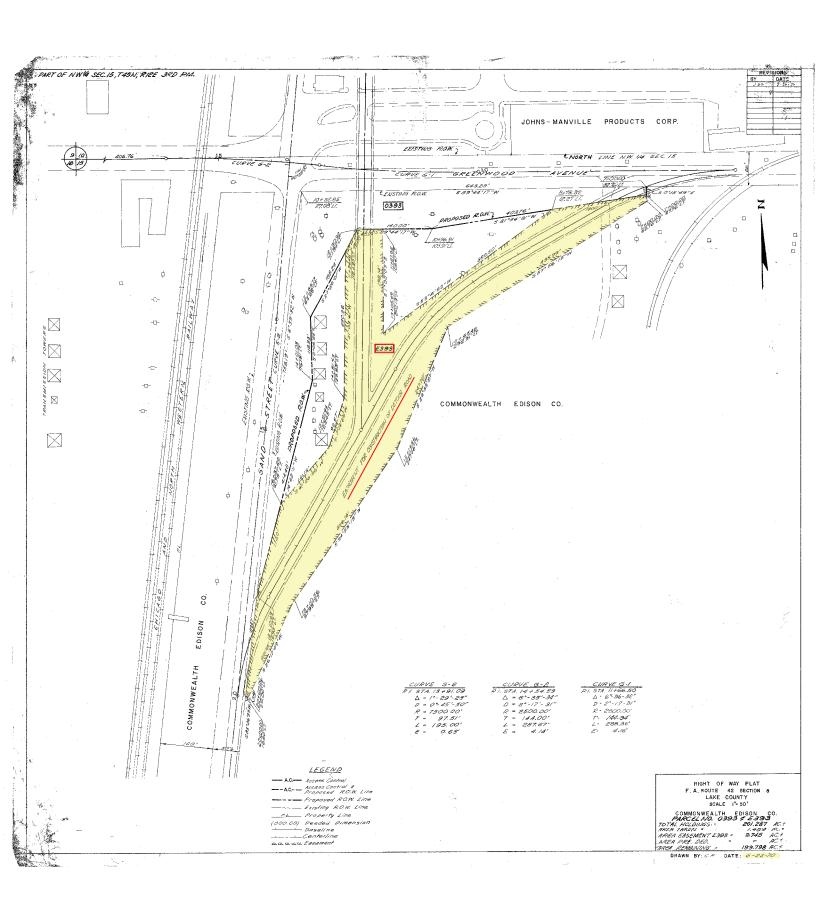


EXHIBIT E

October 25, 2018

EXPERT REBUTTAL REPORT OF DOUGLAS G. DORGAN JR. ON DAMAGES ATTRIBUTABLE TO IDOT

JOHNS MANVILLE VS ILLINOIS DEPARTMENT OF TRANSPORTATION

Former Johns Manville Facility Site 3 and Site 6 Waukegan, Illinois

PREPARED BY



TABLE OF CONTENTS

1	INTRODUCTION	1
	1.1 Summary	1
	1.2 Information Considered	
2	REBUTTAL OPINIONS	2
	2.1 The Gobelman Report Relies on an Inaccurate, Inconsistent, and Unreliab	le
	Methodology	2
	2.2 The Base Map (Figure 1) of the Gobelman Report Inaccurately Represent	s the
	Boundary and Features of Site 3	3
	2.3 Mr. Gobelman Incorrectly Interprets the Scope of IDOT's Area of Liability	on
	Site 3 based on the IPCB Order	
	2.4 Mr. Gobelman Misinterprets the Board's Decision on Parcel No. 0393	8
	2.4.1 Northeast Excavation	9
	2.4.2 North Shore Gas	9
	2.4.3 AT&T	10
	2.5 Mr. Gobelman Incorrectly Interprets the Scope of IDOT's Area of Liability	on
	Site 6	10
	2.5.1 Greenwood Avenue Construction Considerations	10
	2.5.2 Failure to Consider Remedy Drivers	11
	2.5.2.1 AT&T	11
	2.5.2.2 Utility ACM Soils Excavation	
	2.5.2.3 North Shore Gas	
	2.5.2.4 Ramp	12
	2.6 Mr. Gobelman's Site 3 and Site 6 Cost Allocations are Inaccurate	12
	2.6.1 Dewatering	12
	2.6.2 Filling and Capping	13
	2.6.3 General Site Prep, USEPA Oversight, Health and Safety and Legal Sup	port
	Services on Site 3	13

LIST OF FIGURES

- Figure 1 Gobelman Report Exhibit EX-2
- Figure 2 Figure 1 of the Dorgan Expert Report
- Figure 3 Property Boundary Comparison Layout
- Figure 4 Property Boundary Comparison Layout with Site Features

1 INTRODUCTION

1.1 Summary

The report presents my response to the Expert Rebuttal Report of Steven L. Gobelman, dated August 22, 2018 (herein referred to as the "Gobelman Report"). I am rebutting "opinions" expressed by Mr. Gobelman in the Gobelman Report and in his deposition. In addition, I have addressed various "factual" statements contained in the Gobelman Report and in his deposition. My opinions in my initial report and this rebuttal report are made to a reasonable degree of scientific certainty. I reserve the right to supplement this and my initial Expert Report of Douglas G. Dorgan Jr. on Damages Attributable to IDOT ("Dorgan Expert Report") if additional, relevant information becomes available.

1.2 Information Considered

For purposes of this report, in addition to reviewing the documents presented within the Gobelman Report and those noted in my Dorgan Expert Report, I have reviewed documents produced in response to a document request sent to Mr. Gobelman and the Deposition of Mr. Gobelman taken on October 2, 2018. Some specific documents referenced herein have been cited within this Expert Rebuttal Report.

2 REBUTTAL OPINIONS

The following provides my expert rebuttal opinions, followed by information supporting these opinions:

2.1 The Gobelman Report Relies on an Inaccurate, Inconsistent, and Unreliable Methodology

After reviewing Mr. Gobelman's Report and deposition, I affirm my opinions and methodology in my Dorgan Expert Report, which take into consideration the way in which the work was performed at the Sites and the way the Board crafted its Order by referencing areas and soil borings.

Mr. Gobelman and I agree on how JM's Implementation Costs were tabulated and allocated to Site 3 and Site 6. There appears to be no dispute over the total amount of Implementation Costs incurred by JM, the reasonableness of those Implementation Costs, that JM paid those Implementation Costs, how I assigned those Implementation Costs into task buckets, how I allocated those Implementation Costs between Sites 3 and 6, and/or how I assigned and attributed the collective Site 3 and 6 Implementation Costs. Mr. Gobelman agrees with the methodology on these points and incorporates it in the Gobelman Report. Our opinions, however, diverge on how the Implementation Costs are "attributed" to IDOT. My approach is more reasonable and accurate.

Mr. Gobelman does not have a consistent methodology for attributing costs to IDOT and mixes various approaches throughout his Gobelman Report. For example, in some instances, he uses linear feet to calculate the portion of costs attributable to IDOT for a non-uniform excavation (Utility/ACM Soils) and in others, he uses square feet (Northeast Excavation), again for a non-uniform excavation. While Mr. Gobelman agrees that using volume would be a reasonable approach, he never utilizes it.

Further, as explained below, Mr. Gobelman's opinions are based upon a flawed Base Map (Figure 1 of the Gobelman Report). Mr. Gobelman's Site 3 IDOT attribution calculations are based on this flawed figure, which contradicts the USEPA-approved figure the Board relied on in entering the IPCB Order. Mr. Gobelman's Site 6 IDOT attribution calculations are based on a flawed understanding of the work done on Site 6. Because of this, Mr. Gobelman's attribution calculations for Sites 3 and 6 are incorrect.

The Gobelman Report fails to consider why certain cleanup activities were required and how the scope of the cleanup was driven by Site conditions and where visible ACM was observed during earlier investigation activities. As presented in Figure 2 of the Dorgan Expert Report, visual ACM was found predominantly in the IDOT Areas of Liability and the record suggests that the visual ACM drove the work mandated by the Enforcement Action Memorandum (EAM) and the work ultimately performed.

The work done for the North Shore Gas (NSG) line on Site 3 is a good example of how IDOT contamination drove the remedy. As explained in the Dorgan Expert Report, the only ACM found along the NSG line on Site 3 was attributed to IDOT by the Board (borings B3-15 and B3-50). In the EAM, USEPA required the creation of a 25-foot clean corridor for all of the NSG line on Site 3, notwithstanding whether ACM was found directly above a section of the line or not.

The Gobelman Report also too narrowly limits IDOT's areas of liability to the area immediately around soil borings specifically identified by the Board in the Order. This approach is inconsistent with USEPA's requirements, including but not limited to, 1) that each soil boring represents a 50 by 50-foot area and that JM remove all ACM contamination within this area, and 2) JM remove ACM contamination extending to the next clean boring. The Gobelman Report, therefore, improperly, incorrectly, and unreasonably takes too restrictive an approach in opining on the costs attributable to IDOT.

2.2 The Base Map (Figure 1) of the Gobelman Report Inaccurately Represents the Boundary and Features of Site 3

The Gobelman Report contains figures for Sites 3 and 6, with mapping of boundaries and boring locations, that are based on Mr. Gobelman's "interpretation" of a Google image that he indicates shows a fence around Site 3 (see **Figure 1 – Gobelman Report; Exhibit EX-2**). This methodology is not reasonably relied upon by experts in the field. It is also inconsistent with figures approved by USEPA and used by the Board in ruling on the issues from the first phase of this case after hearing. These Gobelman figures inaccurately plot the Site 3 boundaries, the soil boring locations, Parcel No. 0393 and the various areas (including utilities) where JM performed work. As a result, the overall Gobelman Report is inaccurate and misleading.

For example, Figure 1 of the Gobelman Report, which is the basis for Mr. Gobelman's other figures, presents an incorrect Site 3 boundary. Mr. Gobelman's fundamental argument, as stated in his deposition, is that the boundary of Site 3 should be further north (about ten feet) than where it is represented on Figure 1 of the Dorgan Expert Report (included herein as **Figure 2**) and the AECOM Final Report submitted to USEPA. As discussed further below, Mr. Gobelman's inaccurate relocation of the northern boundary of Site 3 leads to an improper plotting of the Parcel No. 0393 boundary. It even appears that Mr. Gobelman laid out Parcel No. 0393 incorrectly from his referenced IDOT Document #1517501, furthering the incorrect Parcel location. As a result, Mr. Gobelman comes to the incorrect opinion that various samples and areas where work was performed by JM are not located within Parcel No. 0393. By creating his own flawed map, Mr. Gobelman misleadingly and improperly reduces the areas where the Board has held IDOT liable (such as Parcel No. 0393) and the corresponding costs attributable to IDOT in those areas.

Mr. Gobelman claims (as represented within EX-1 of the Gobelman Report) that AECOM, Mr. Dorgan, and Atwell <u>all</u> incorrectly plotted the boundaries of Site 3 based on three source documents he claims do not match. It is my understanding that Mr. Gobelman created an overlay of the Site 3 boundary (see **Figure 1**) using these three documents:

- 1. The Atwell ALTA Survey presented as Exhibit G of the Dorgan Expert Report (Atwell Survey);
- 2. Figure 2 in the AECOM Final Report, Southwestern Site Area, Sites 3, 4/5, and 6, Waukegan Illinois dated March 20, 2018 (AECOM Figure 2); and¹
- 3. Figure 1 of the Dorgan Expert Report (Dorgan Expert Report Figure 1).

To properly compare boundaries on a map, you must have a reference to a common geographical point. This is a fundamental component of preparing such a comparison based upon my past experience. Mr. Gobelman admitted in his deposition that he did not have and did not use such a common reference point to compare the figure boundaries. Mr. Gobelman's methodology is therefore improper.

While Mr. Gobelman claimed that he used the State Plane Coordinate System as the reference point, he acknowledged in his deposition that these coordinates were not included on two of the three source figures. Without a consistent reference point, it was an improper and an unreliable methodology for Mr. Gobelman to try and compare the three figures. His conclusion that the figures do not match, and his depiction of the inconsistencies as represented in EX-1, are inaccurate.

To create his own Site 3 boundary figure, Mr. Gobelman used what he interpreted as a fence line on a Google Map image. He then "assumed that Site 3 was contained within the shown fencing except in the northwest and northeast corner of Site 3." He offers no basis for this assumption, and in his deposition acknowledges, "I would assume that my boundaries would be a little bit larger than – than what was depicted because I'm using a fence line and not the actual site." This statement counters his logic that the fence line is the property boundary and in reality this makes his Site 3 larger than the correct boundary. He then superimposes his incorrect interpretation of the boundaries from EX-1 onto the Google Map image along with his interpretation of the Site 3 boundaries (see Gobelman Report at EX-2, included herein as **Figure 1**). He also includes on EX-2 his interpretation of where Parcel No. 0393 and the Northeast Excavation are located. Because his plots are based upon flawed Site 3 boundaries and faulty interpretation of Document 1517501, their locations are incorrect on EX-2 and the other Gobelman Report figures. Per the supported documentation provided by Mr. Gobelman regarding the legal description of Parcel 0393, I found multiple errors in his interpretation of Document

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¹ Based upon the attachments to his Gobelman Report, I believe Mr. Gobelman's reference above to AECOM Figure 2 is intended to be a reference to Figure 2 of Appendix A of the AECOM Final Report (see Gobelman Report at Appendix D) that was prepared by CQM, Inc.

² Line 18 – 21, Page 98, Gobelman deposition.

1517501. He begins his description of the boundary for Parcel 0393 at the location where it turns south into Site 3, using a given bearing of S 0° 15′ 49" E at 15 feet. At this point, the following errors are evident:

- 1. Document 1517501 states the parcel boundary to a bearing of S 81° 54′ 31" W at 403.76 feet, however, Gobelman plotted this bearing as S 83° 3′ 38″ W at 365.53 feet.
- 2. Document 1517501 parcel boundary continues at a bearing of S 89° 44'17" W at 140.0 feet, however, Mr. Gobelman plotted this at S 83° 16′ 50" W at 180.66 feet; this appears to be continuing in the same direction as the previous bearing.
- 3. The lengths plotted by Gobelman as noted above are not consistent with the lengths referenced in Document 1517501.

The misinterpreted bearings and faulty lengths both contribute to the incorrect layout and location of Parcel 0393.

Based on Mr. Gobelman's claim that the boundary for Site 3 is not consistent on the referenced figures, I verified the boundary with my own overlay using AutoCAD and GIS.3 I have created my own figure showing an overlay of the Site 3 boundaries provided on the referenced figures (included herein as Figure 3). Figure 3 presents boundaries based on the following figures:

- 1. Figure 2 of Appendix A of the AECOM Final Report (CQM Figure 2);
- 2. Dorgan Expert Report Figure 1;
- 3. The Atwell Survey; and
- 4. Gobelman Report Figure 1.

I used the above referenced four figures to demonstrate the differences between the boundaries depicted in my Dorgan Expert Report and in the Gobelman Report. My approach is a more technical and defensible methodology for assessing the boundary of Site 3 and one that is recognized as reasonably reliable by those in my field. Figure 3, which relies on this methodology, is accurate and aligns with the figures contained in AECOM's Final Report.

The varying boundaries for Site 3 as shown on Figure 3 are based on the following:

1. CQM Figure 2 from the AECOM Final Report submitted to USEPA - The four corners of Site 3 contained coordinates aligning with the Illinois East State Plane Coordinate System NAD83, with the boundaries subsequently placed to those locations. The North, West, and South boundary lines were connected to those

³ The use of Autodesk AutoCAD Civil 3D software allows the global connection to the given coordinate systems of Illinois East NAD83 for more precise location. The base grid point N 2,083,000 & E 1,122,500 can be identified and a 100'x100' grid created for comparable construction of the different boundaries represented on the above referenced figures.

corners and the East curved boundary was drawn per visual interpretation of CQM Figure 2;

- 2. Figure 1 of Dorgan Expert Report This Figure was created by obtaining the CAD drawing being used by AECOM. The original AECOM figure was produced using Illinois East State Plane Coordinates for the Site 3 corners. Certain features were then shown such as the samples exhibiting Visual ACM. The boundaries of Site 3 were laid out with measurements from the coordinates of Parcel No. 0393 and the Illinois East State Plane Coordinate grid anchored within the source AutoCAD file. It shows Parcel No. 0393 with bearings and directions located along the Greenwood Avenue right of way. The location of Parcel No. 0393 is illustrated on this Figure using the legal description referenced at Document 1649408;
- 3. Atwell Survey The boundaries for Site 3 on the Atwell Survey were laid out using scaled measurements taken from the Illinois East State Plane Coordinate grid to locate the northwest corner of Site 3; from there, the boundary was plotted based on the bearings of length and direction described on the Atwell Survey;
- 4. Gobelman Figure EX-2 The boundaries of Site 3 were laid out using Gobelman Figure EX-2, which shows the State Plane Coordinate grid and Parcel No. 0393 in relation to his Site 3 boundary based on his fence line interpretation and interpretation of Document 1517501. It is apparent that Mr. Gobelman created the southern and western boundaries to align with his interpretation of the fence line without any bearing or point of beginning, which is improper methodology.

As illustrated on the Property Boundary Comparison Layout (Figure 3), each description has been presented and color coded. As Figure 3 demonstrates, there is strong consistency between the Dorgan Expert Report Figure 1 and the CQM Figure 2 from the AECOM Final Report. It is important to understand that the Site 3 boundary as shown on Dorgan Expert Report Figure 1 and CQM Figure 2 are comparable with the legal description boundary between the ComEd parcel and the IDOT Right of Way. The boundary of Site 3 on the Dorgan Expert Report Figure 1 and CQM Figure 2 have a direct relationship to the Illinois East State Plane Coordinate System NAD83. By contrast, Gobelman EX-2 (and each of his other figures) uses a fence line as an arbitrary reference point. Furthermore, the northern boundary of Site 3 has its origination in early negotiations with USEPA and the original Settlement Agreement executed in 2008. The boundary as represented on CQM Figure 2 (and on Figure 1 of the Dorgan Expert Report), has been accepted and deemed accurate by USEPA since inception of work on Site 3 and Site 6.

It is my opinion that Gobelman EX-1, EX-2, Figure 1, and the remaining figures contained in the Gobelman Report misrepresent the boundaries and features of Sites 3 and 6 and Parcel 0393. Mr. Gobelman's arbitrary use of a fence line in a Google Map image as a reference point for creation of his figures has the effect of moving the northern boundary of Site 3 more north. This incorrectly modifies how certain sample locations (e.g., B3-45)

and remedial activities (e.g., AT&T telephone line abandonment) are depicted on his figures. **Figure 4** - **Property Boundary Comparison Layout with Site Features** presents the modified boundary compared with the key remedial areas (e.g., AT&T lines, NSG Line, NE Excavation, and City of Waukegan Water Line).

In his deposition, Mr. Gobelman admitted that he relied upon sources he claims contained the wrong Site 3 boundaries (e.g., Dorgan Figure 1, the Atwell Survey, CQM Figure 2) to plot the locations of soil borings/samples, remedial features, and other key elements on his same Base Map/Figure 1. This is an improper methodology that calls into question all of his opinions.

2.3 Mr. Gobelman Incorrectly Interprets the Scope of IDOT's Area of Liability on Site 3 based on the IPCB Order

Mr. Gobelman opines that IDOT's liability, as found by the Board, is confined to specific soil boring locations, specifically including B3-25, B3-15, B3-16, B3-50, and B3-45. He also says that his attributions for Site 3 are based upon the eastern edge of Parcel No. 0393. As noted above and on **Figure 3**, the location of Parcel No. 0393, the NSG line, the AT&T lines, the Northeast Excavation, and Site 3 boundary are inaccurate, making his attribution opinions incorrect.

Mr. Gobelman fails to consider that a soil boring, typically not more than 2 inches in diameter, is intended to be representative of a larger area. Test pits are similarly intended to be representative of a larger area. The record reflects that USEPA considered every soil boring/test pit to represent a 50-by-50-foot grid of contamination that needed to be remediated. Moreover, as Mr. Gobelman stated, the USEPA required the remediation work to travel to the first clean boring.⁴

Each soil boring/test pit served as a representation of the conditions at and under that location, a point Mr. Gobelman ignores. In many situations, the ACM contamination connected to a given soil boring/test pit was much larger in depth and width than what was collected in the sample. For example, as stated in the Dorgan Expert Report, Mr. Dave Peterson explained that, upon excavation, a consistent seam of ACM was observed along the entire transect from 1S-8S that had been placed there at the same time.

Once remediation began, the scope of the contamination present at each of the original soil sample locations was identified. USEPA required JM to remove soils to a depth where no visual ACM was present and where no ACM was detected. This caused the amount of ACM removed in certain locations to vary. For example, JM had to excavate deeper and remove more material on the western portion of the Northeast Excavation than on the eastern portion because the ACM had been buried at a greater depth on the western side.

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⁴ Gobelman Deposition, Page 137, Line 4 and 5

JM was required to remove much more than the amount of soil depicted as a soil boring on a given figure contained in the AECOM Final Report or Dorgan Expert Report Figure 1. Mr. Gobelman does not take this into account. I therefore disagree with Mr. Gobelman's method of treating IDOT's liability so narrowly as it is not consistent with USEPA's required scope of work or with how experts in the field view what is represented by contamination found in a single boring.

2.4 Mr. Gobelman Misinterprets the Board's Decision on Parcel No. 0393

Based on Figure 1 of the Gobelman Report, as discussed above in Section 2.2, Mr. Gobelman concludes that B3-45 does not fall within Parcel No. 0393. This conclusion is based solely on his flawed Base Map/Figure 1, which misrepresents the Site 3 boundary. The location of soil boring B3-45 as presented on Figure 1 of the Dorgan Expert Report is accurate and shows B3-45 (which represents a 50-by-50 foot area) as falling within the IDOT Area of Liability. Any conclusions in the Gobelman Report based on soil boring B3-45 falling outside the boundary of Parcel No. 0393 are therefore faulty.

As stated in the Dorgan Expert Report, the Order specifically references areas of Site 3 where the Board determined IDOT is responsible for the presence of ACM:

- 1. Where IDOT restored Site 3 after construction (samples B3-25, B3-16 and B3-15);⁵ and
- 2. Where IDOT allowed open dumping through its control over Parcel No. 0393 at sample locations B3-25, B3-16, B3-15, B3-50, and B3-45 (to the extent sample B3-45 falls on Parcel 0393) on Site 3.6

Mr. Gobelman argues that IDOT's responsibility is for a "defined area based on soil sample locations within Parcel 0393." He is suggesting that IDOT's responsibility is limited to only those areas immediately in proximity to the specific soil borings referenced in the IPCB Order. Mr. Gobelman fails to consider the work mandated by USEPA that occurred well outside the immediate proximity of the referenced soil borings. As examples, work related to construction of a clean corridor for the City of Waukegan Water Line, sampling of the ramp area, and abandonment of AT&T telephone lines located across Parcel No. 0393 were driven in large part by ACM encountered at the boring locations identified by Mr. Gobelman on Parcel No. 0393.

Furthermore, Mr. Gobelman fails to consider the language and spirit of the Board's Order, which states, "IDOT's interest in Parcel 0393 therefore gives it the right to control a portion of Site 3. Within that portion of Site 3, ACM waste is present in the soil. By continuing to control the portion of Parcel 0393 falling within Site 3 (emphasis added),

⁶ IPCB Order page 13

⁵ IPCB Order page 10

⁷ Section 5.2 of Gobelman Report

IDOT continues to allow ACM waste in that soil." The Board is clearly referencing the entirety of Parcel No. 0393 located within Site 3. As a result, it is my interpretation that the Board intended to attribute all work done by JM in, on and under Parcel No. 0393 (which IDOT controls given its easement interests) to IDOT, not just work done in areas in close proximity to certain boring locations within Parcel 0393. As a result, all costs associated with Parcel No. 0393 (including my attribution of \$61,0247 of the Waukegan Water Line, \$20,880 of ramp work, and other costs identified below) should be attributed to IDOT, which the Board found controls the parcel and the ACM present in the soil.

2.4.1 Northeast Excavation

Mr. Gobelman's flawed approach does not consider what was driving the work in the Northeast Excavation, including the fact that the work had to be performed in 50 by 50-foot grids, the fact that the work had to extend to the nearest clean boring, and the fact that the ComEd Fiber Optic line that USEPA required be removed due, in part, to the fact it ran through 1S-4S (IDOT Area of Liability) also travels through the Northeast Excavation. Work performed for the Northeast Excavation included removal of soils from three square grids represented by the soil boring locations (see Dorgan Expert Report Figures 1 and 2). All the soil from within the grid was required to be removed based upon findings from the specifically referenced soil boring (e.g., B3-50 and B3-45). That is two thirds of the excavation. The eastern grid area was removed because B3-46 contained contamination as well as the fact that the ComEd fiber optic line attributed to an IDOT Area of Liability was located in this area.⁸ As a result, it is my opinion that all of the Northeast Excavation work should be attributed to IDOT. Additionally, Mr. Gobelman's calculation that 1,905 square feet fall within Parcel No. 0393 is incorrect because it is based upon an inaccurate Base Map/Figure 1 and plotting of Parcel No. 0393 (see Gobelman Report Figure 6).

2.4.2 North Shore Gas

As stated in the Dorgan Expert Report, the portion of the NSG Line on Site 3 runs <u>only</u> through IDOT Areas of Liability. Mr. Gobelman ignores this fact and instead focuses on the areas surrounding B3-50 and B3-15 to attribute costs to IDOT. I disagree with this approach as noted above. Since the only ACM found along the NSG line on Site 3 was attributed to IDOT by the Board, Mr. Gobelman should have included all of the costs associated with work on the NSG line on Site 3 to IDOT. This is a more reasonable and accurate approach.

Mr. Gobelman's restrictive view and approach to liability causes him to underestimate the costs attributable to IDOT with respect to the NSG line on Site 3 (see Dorgan Expert Report) as well as the Site 3 and 6 collective costs relating to NSG (see Dorgan Expert

⁸ USEPA Correspondence to Johns Manville dated February 1, 2012

Report). Mr. Gobelman underestimates this attribution by more than \$240,000 for Site 3 and more than \$30,000 for combined Site 3 and Site 6 costs.

Additionally, Mr. Gobelman's incorrect plotting of Parcel No. 0393 on his Base Map/Figure 1 results in less of the NSG line falling within Parcel No. 0393 (see **Figure 4**). Consequently, even using his own methodology, his conclusion that 3,278 square feet of the NSG line falls within Parcel No. 0393 (an IDOT Area of Liability) is incorrect.

2.4.3 AT&T

Mr. Gobelman used linear feet to calculate IDOT's liability related to the AT&T lines on Site 3. However, because his Base Map/Figure 1 is incorrect, he fails to account for AT&T lines that traverse Parcel 0393 that are shown correctly on Figure 1 of the Dorgan Expert Report and in the CQM Figure 2 contained in the Final Report. The actual linear footage of AT&T lines within Parcel 0393 is approximately 625 feet.

I continue to believe that my approach of considering how many AT&T lines ran through IDOT's Area of Liability (2 out of 3) and thus drove the remedial work to be a more reasonable approach. If one were to use Mr. Gobelman's approach, however, the IDOT attribution would not be materially different. As the total linear footage of the two AT&T lines that are within IDOT Areas of Liability is 625 feet, which is 57 percent of total linear footage of AT&T lines on Site 3.

2.5 Mr. Gobelman Incorrectly Interprets the Scope of IDOT's Area of Liability on Site 6

In Section 5.3 of the Gobelman Report, Mr. Gobelman again takes a narrow view of the scope of IDOT's responsibility based on the geographic limitations of soil sample locations 1S through 4S. I believe there are at least two important factors Mr. Gobelman fails to consider in his evaluation including:

- 1. The IPCB Order did not consider the full scope of soils removal and backfill plans for the south right of way of Greenwood Avenue; and
- 2. Mr. Gobelman does not consider the conditions that drove the scope of the cleanup on the south side of Site 6.

I have addressed each of these factors below.

2.5.1 Greenwood Avenue Construction Considerations

In Section 3.1.1 of the Dorgan Expert Report, I address in detail the Greenwood Avenue construction considerations that inform the scope of remediation and IDOT's liability for the work performed. I address the original construction plans, IDOT's requirement to remove unsuitable material from under the Greenwood Avenue Right of Way, and conditions observed by Mr. Peterson during remediation activities. Mr. Gobelman does

not address or rebut most of these points, including my discussion of Hearing Exhibit 21-A-26 (see Section 3.1.1.2 of the Dorgan Expert Report) and Mr. Peterson's visual observations. Consequently, I continue to believe that IDOT is responsible for Implementation Costs JM incurred for any and all work associated with and/or caused by contamination in sample grids 1S-8S.

2.5.2 Failure to Consider Remedy Drivers

As noted above, most of the visual ACM was encountered within IDOT's Area of liability (see Figure 2 of the Dorgan Expert Report). As a result of the buried visual ACM, USEPA required creation of a 25-foot clean corridor for all buried utilities on the Sites, "regardless of whether impacts from ACM were noted in the overlying soil during the assessment." Since IDOT is responsible for most of the visual ACM found on the relevant areas of the Sites, IDOT's unlawful disposal of ACM was the primary driver of the work required by USEPA in these areas, especially with respect to the clean corridors. For example, at the time the EAM¹⁰ was issued, no ACM had been found east of soil sample location 8S. Nonetheless, USEPA required a clean corridor for the entire NSG line from 4S and moving east regardless that ACM had not been found east of 8S.

2.5.2.1 AT&T

To determine IDOT's attribution for AT&T on Site 6, Mr. Gobelman calculates what he believes to be the length of the entire northern and southern corridor for Site 6. He says that this comes to 5,470 linear feet. He then calculates what he believes to be IDOT's responsibility based on linear feet, assuming the AT&T lines run the length of the entire corridor on both the north and south sides of Site 6. Based on the record, the AT&T lines do not run the entire length of the north and south corridor on Site 6. As a result, Mr. Gobelman's calculation is incorrect.

Given what was driving the removal of the AT&T lines (the visual ACM found along these lines) I believe my original approach that attributed costs to IDOT based on the number of lines running through the IDOT Area of Liability is more reasonable and more accurate than Mr. Gobelman's approach.

2.5.2.2 Utility ACM Soils Excavation

Mr. Gobelman's assessment of IDOT's responsibility for ACM soils excavation is based upon the assumptions that JM created clean corridors for the entire north and south sides

⁹ Correspondence dated December 20, 2012 from Bryan Cave to USEPA Re: Notice of Dispute Concerning Enforcement Action Memorandum dated November 30, 2012, Page 7 and Page 10.

¹⁰ USEPA Enforcement Action Memorandum dated November 30, 2012.

of Site 6¹¹ and that the amount of soil removed all along the south side of Site 6 was consistent. These assumptions are inaccurate based upon the record.

In part, given what was driving the removal of the soils, the visual ACM found along these lines, in particular those from 1S-4S and, in some instances 1S-8S, I believe my original approach of attributing the costs to IDOT based upon the number of lines running through the IDOT Areas of Liability was more reasonable and more accurate than Mr. Gobelman's approach.

2.5.2.3 North Shore Gas

Mr. Gobelman incorrectly claims that I said that "the length [of the NSG line] along the south side of Site 6 is approximately 2005 linear feet." Mr. Gobelman then calculates how much of this 2005 linear feet is located solely around 4S. He concludes it is 47 linear feet.

For the reasons stated herein, including that visual ACM in the IDOT Areas of Liability drove the need to remove the NSG line on the south side of Site 6 and the fact that JM was required to create clean corridors for the entire NSG line east of 8S, notwithstanding whether ACM was present, I disagree with Mr. Gobelman's approach and maintain that IDOT is responsible for all costs associated with the removal of the NSG line on the south side of Site 6. I did not include any costs associated with the removal of the NSG line on the north side of Site 6.

2.5.2.4 Ramp

Figure 7 of the Gobelman Report depicts what Mr. Gobelman believes to be the ramp referenced in the Dorgan Expert Report. The depiction is inaccurate. The "ramp" work identified in Mr. Dorgan's report included large portions of the northwest corner of Site 3 entirely within Parcel No. 0393. Accordingly, any opinions Mr. Gobelman makes about the "ramp" are incorrect. Since the ramp work was contained within Parcel 0393 and was driven by ACM found in this IDOT Area of Liability, I believe my approach was more reasonable and more accurate than Mr. Gobelman's approach.

2.6 Mr. Gobelman's Site 3 and Site 6 Cost Allocations are Inaccurate

2.6.1 Dewatering

Mr. Gobelman's dewatering calculations are inaccurate because they are predicated upon incorrect attributions of IDOT liability based upon narrowly defined boring locations, a flawed Base Map/Figure 1, a misunderstanding of the work done on Site 6, and an improper methodology that ignores what was driving the dewatering work. I believe my

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¹¹ Gobelman Deposition, Page 126.

approach at looking at what was driving the need to do the dewatering work as more reasonable and accurate than Mr. Gobelman's approach.

2.6.2 Filling and Capping

Mr. Gobelman's filling and capping calculations are inaccurate because they are predicated upon incorrect attributions of IDOT's liability based upon narrowly defined boring locations, a flawed Base Map/Figure 1, a misunderstanding of the work done on Site 6 and an improper methodology that ignores what was driving the filling and capping work. I believe my approach at looking at what was driving the need to do the filling and capping work as more reasonable and accurate than Mr. Gobelman's approach.

Moreover, his approach is unreasonably limited in that it does not include the total area of IDOT Areas of Liability to determine acreage. Rather, he calculates acreage based on calculations made in his flawed figures and based upon his incorrect view of the area and work required by USEPA in remediating various soil borings. For example, with respect to Site 3, he did not include acreage for Parcel 0393 (0.54 Acres), the entire Northeast Excavation or the entire NSG line.

2.6.3 General Site Prep, USEPA Oversight, Health and Safety and Legal Support Services on Site 3

Mr. Gobelman's attribution approach follows my method of assigning site-wide costs by dividing IDOT's share of the construction-related costs by the total construction-related costs. Because Mr. Gobelman miscalculated IDOT's share of the construction-related costs, all of his calculations for these site-wide costs categories are incorrect, unreasonable, and unreliable.

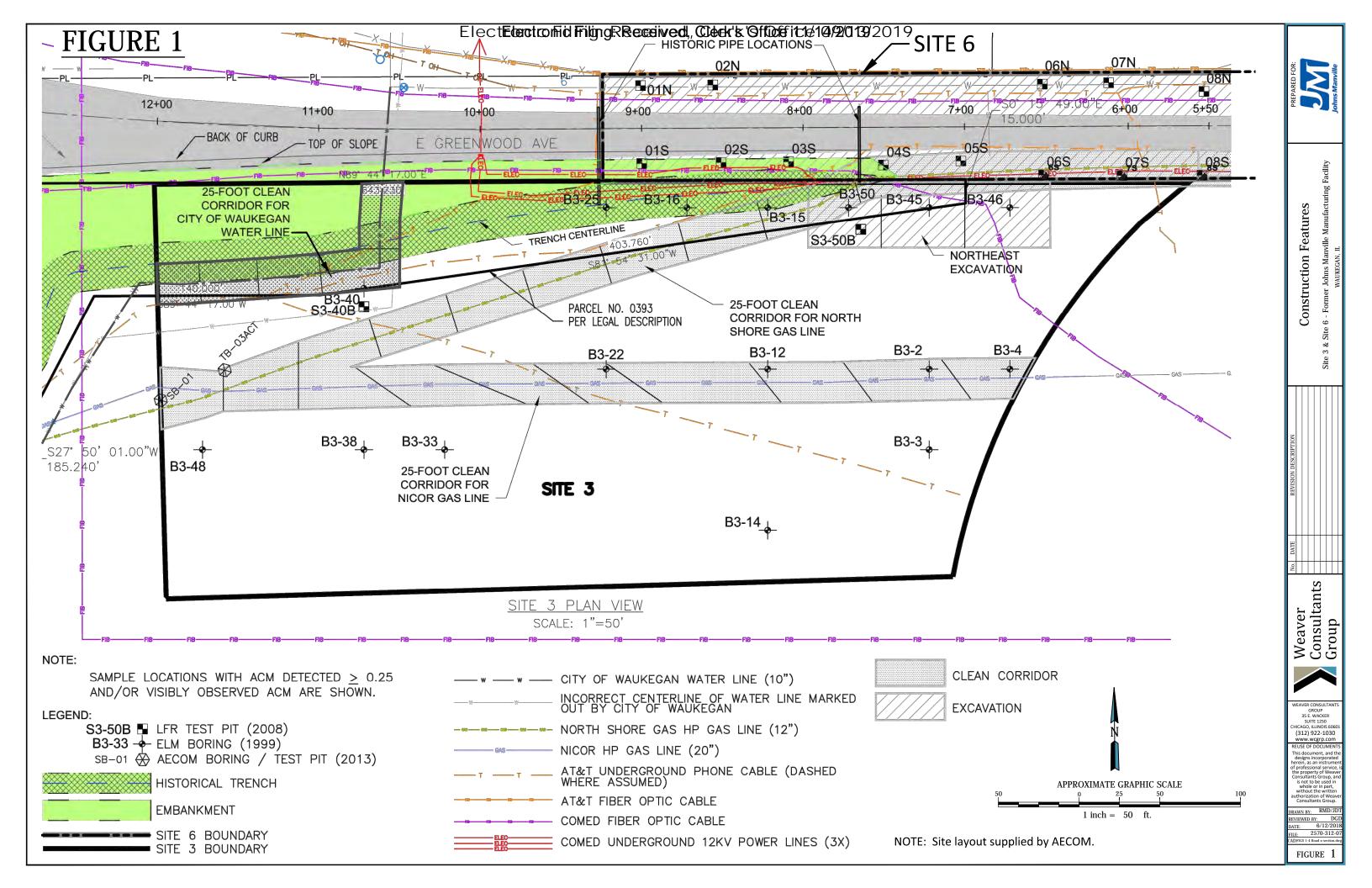
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Figures

Figure 1 Gobelman Report Exhibit EX-2

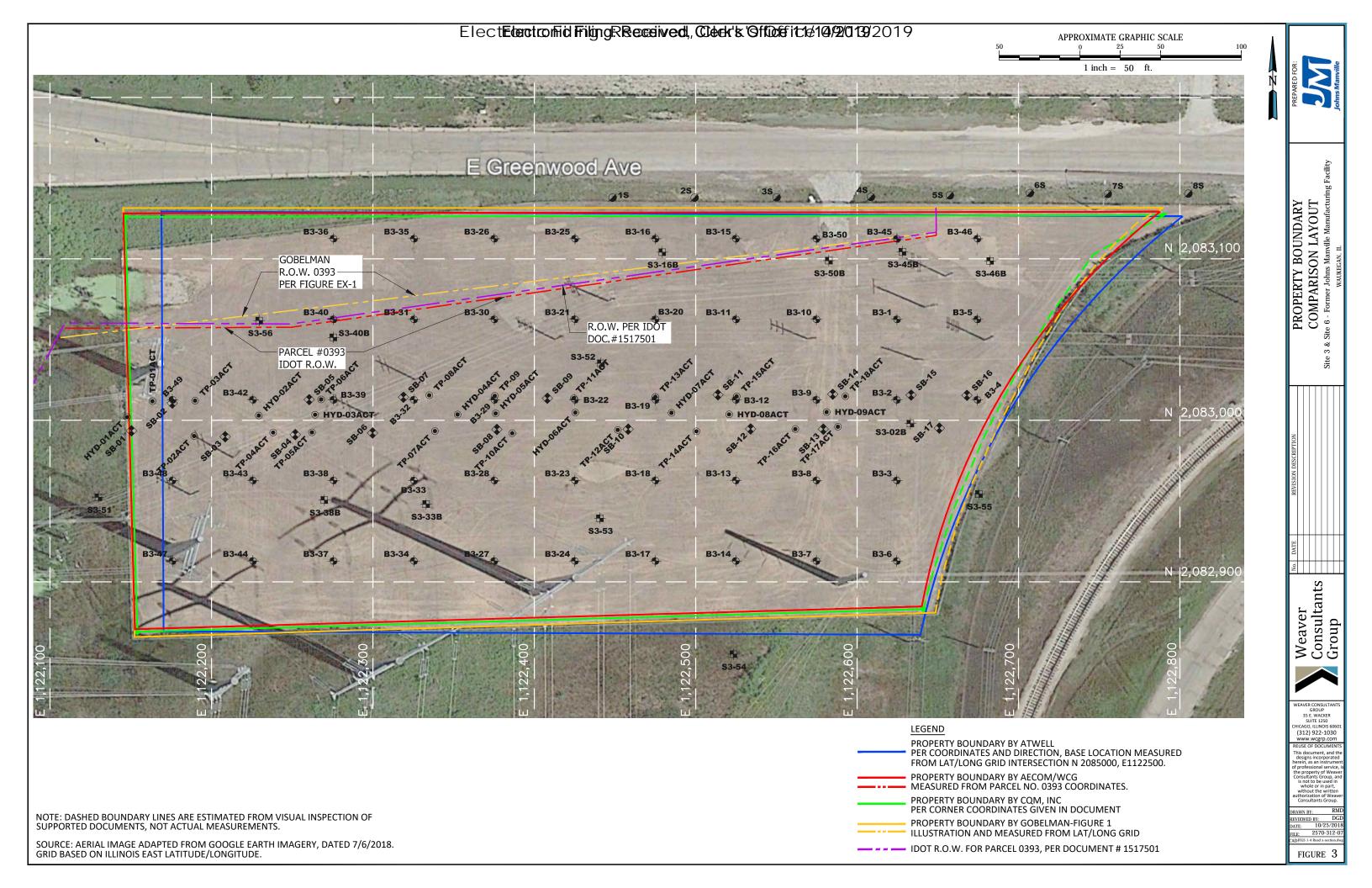
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Figure 2 Figure 1 of the Dorgan Expert Report



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Figure 3 Property Boundary Comparison Layout



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Figure 4
Property Boundary Comparison Layout with Site Features

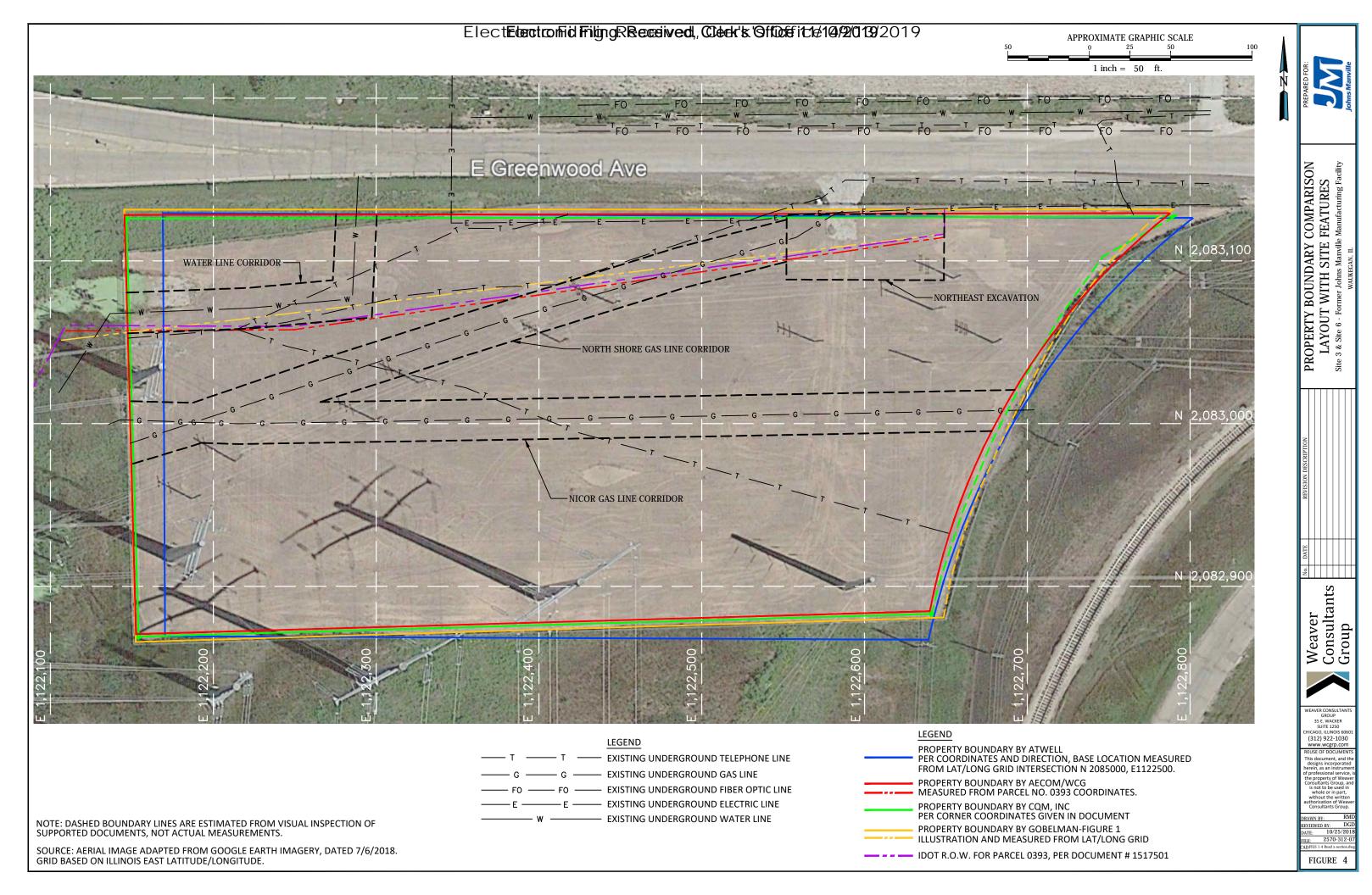


EXHIBIT F

Expert Rebuttal Supplemental Report of Steven Gobelman on Damages Attributable to IDOT Based on IPCB Order of December 15, 2016

Johns Manville Vs Illinois Department of Transportation





3300 Ginger Creek Drive Springfield, IL 62711 Tel: 217.787-2334

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TABLE OF CONTENTS

1	PURF	POSE AND SUMMARY	1
2	COS ⁷ 2.1	T ATTRIBUTED TO IDOT'S RESPONSIBILITY AS DEFINED BY IPCB	
3	ATTR	RIBUTION APPROACH	1
	3.1	AT&T	
		3.1.1 Site 3	1
		3.1.2 Site 6	
		3.1.3 Sites 3 and 6	2
	3.2	North Shore Gas	
		3.2.1 Site 3	2
		3.2.2 Site 6	
		3.2.3 Sites 3 and 6	3
	3.3	Northeast Excavation	3
	3.4	Dewatering	
		3.4.1 Site 3	
		3.4.2 Site 6	
		3.4.3 Sites 3 and 6	4
	3.5	General Site/Site Preparation	
		3.5.1 Site 3	
		3.5.2 Site 6	5
		3.5.3 Sites 3 and 6	6
	3.6	Health and Safety	
		3.6.1 Sites 3 and 6	6
	3.7	EPA Oversight Costs	
		3.7.1 Site 3	
		3.7.2 Site 6	7
	3.8	Cost for Legal/Legal Support Services	7
4	IDOT	"S RESPONSIBILITY AS DEFINED BY IPCB ATTRIBUTION SUMMARY	7
5	IDOT	"S RESPONSIBILITY AS DEFINED BY IPCB ATTRIBUTION	8

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FIGURES

Gobelman: Figure 1: Site 3 and Site 6 Base Map

Gobelman: Figure 2: Nicor Location Map

Gobelman: Figure 3: City of Waukegan Water Line Location Map

Gobelman: Figure 4: AT&T Location Map

Gobelman: Figure 5: North Shore Gas Location Map Gobelman: Figure 6: Northeast Excavation Location Map

Gobelman: Figure 7: Ramp Location Map

Gobelman: Figure 8: Filling/Capping Location Map

TABLE

Gobelman: Table 1 - Cost Allocation Table

LIST OF APPENDICES

Appendix A – Bibliography of Documents Cited

Appendix B - Exhibit 2

Appendix C – Land Acquisition Easement

1 PURPOSE AND SUMMARY

This supplemental report was written to correct the location of the Parcel 0393 as shown on the base map created in the rebuttal cost report dated August 22, 2018 (Gobelman: Figure 1). Based on this correction Figures Gobelman Figure 2 through Figure 8, Ex-2, and IDOT's cost allocation were revised accordingly. Only those areas within the August 22, 2018 Rebuttal Report affected by the Parcel 0393 location change are presented in this supplemental report.

2 COST ATTRIBUTED TO IDOT'S RESPONSIBILITY AS DEFINED BY IPCB

2.1 Base Map Creation (Gobelman: Figure 1)

The revised location of Parcel 0393 is based on the legal description from the Grant for Public Highway dated August 3, 1971 (Hearing Exhibit 41-1) (1) and IDOT as-build plans pages 23 and 24 (JM001153 and JM001154, Hearing Exh. 21A-23 & 24) (2) that was not correctly presented in my August 22, 2018 Rebuttal Report. Parcel 0393 begins at the intersection of the easterly line of Pershing Road (former Sand Street) and the south line of Greenwood Avenue. The 1971 plan sheets (2) show that IDOT Stationing 7+00 on Greenwood Avenue is at the eastern edge of Parcel 0393. I compared the revised base map created (Gobelman: Figure 1) with the overlay prepared in the original rebuttal report Ex-1 and presented the results in Appendix B, Ex-2.

3 ATTRIBUTION APPROACH

3.1 AT&T

Service	Site 3	Site 6	Sites 3 and 6
Professional – Engineering Related to	\$26,524	\$31,105	
AT&T			
Professional – Completion Related to AT&T		\$15,000	
Construction – T&M Related to AT&T			\$53,548
Construction - Management Related to			\$45,350
AT&T			
Utility Payment to AT&T	\$82,127	\$238,161	
Total	\$108,651	\$284,266	\$98,898
IDOT Attribution	\$20,426	\$4,548	\$6,329

3.1.1 Site 3

Within Site 3 the three AT&T telephone lines equal to approximately 1060 linear feet. The three AT&T telephone lines equal to approximately 199 linear feet within the area attributed to IDOT's responsibility as defined by IPCB or approximate 18.8 percent of the total costs within Site 3. The proportionate cost attributed to IDOT's responsibility as defined by IPCB is \$20,426.

3.1.2 Site 6

The length of the northern corridor is approximately 2,820 linear feet and southern corridor on Site 6 is approximately 2,650 linear feet each, for a total length of approximately 5,470 linear feet JM0040329. The length attributed to IDOT's responsibility as defined by IPCB is 90 linear feet,

1

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from where the AT&T telephone line enters Site 6 to the east of soil sampling location 3S and ends halfway between 4S and 5S. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 1.6 percent (90/5,470) and the proportionate cost for Site 6 is \$4,548.

3.1.3 Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the costs that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the costs attributed to IDOT's responsibility as defined by IPCB (\$24,974) by the total Sites 3 and 6 costs (\$392,917). The percentage attributed to the combined Sites 3 and 6 costs is 6.4 percent (24,974/392,917). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$6,329.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for AT&T work performed attributable to IDOT is \$31,303, as shown in Gobelman: Table 1.

3.2 North Shore Gas

Service	Site 3	Site 6	Sites 3 and 6
Professional – Engineering for North	\$135,159	\$81,028	
Shore Gas			
Construction – T&M for North Shore	\$162,678		\$22,327
Gas			
Construction – Management for North			\$35,830
Shore Gas			
Utility Payment to North Shore Gas	\$34,687	\$153,833	
Total	\$332,524	\$234,861	\$58,157
IDOT Attribution	\$130,682	\$8,455	\$14,248

3.2.1 Site 3

The North Shore Gas line crosses Site 3 and a portion of Parcel 0393 near soil sampling location B3-15 and B3-50 (defined by the IPCB as being within IDOT liability). The distance the North Shore Gas line traverses diagonally across Site 3 with a corridor area is 10,866 square feet (25 foot corridor width). The area of the North Shore Gas line that impacts Parcel 0393 within IDOT's responsibility as defined by IPCB is approximately 4,271 square feet or about 39.3 percent (4,271/10,866) of the total cost within Site 3. The proportionate cost attributed to IDOT is \$130,682.

3.2.2 Site 6

As Mr. Dorgan stated, the capping of the clean corridor occurred within Site 6 near soil sampling location 4S. All capping of the North Shore Gas line on Site 6 was limited to the area around soil sampling location 4S is attributable to IDOT's responsibility as defined by IPCB.

Mr. Dorgan states that the length along the south side of Site 6 is approximately 2,005 linear feet. The length attributed to IDOT's responsibility as defined by IPCB is approximately 72 linear feet, from where the North Shore Gas line enters Site 6 to the west of soil sampling location 4S and

ends just east of soil sampling location 4S. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 3.6 percent and the proportionate cost for Site 6 is \$8,455.

3.2.3 Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the costs that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the costs attributed to IDOT's responsibility as defined by IPCB (\$139,321) by the total Sites 3 and 6 costs (\$567,385). The percentage attributed to the combined Sites 3 and 6 costs is 24.5 percent (139,321/567,385). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$14,248.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for North Shore Gas line work performed within IDOT's responsibility as defined by IPCB is \$153,385, as shown in Gobelman: Table 1.

3.3 Northeast Excavation

The Northeast Excavation is shown on the work plan to be 150 feet by 50 feet or 7,500 square feet. Part of the Northeast Excavation area is incorporated within Parcel 0393 as it relates to the area IDOT's responsibility as defined by IPCB, as shown on Gobelman: Figure 6.

The area of Parcel 0393 contained within the Northeast Excavation is approximately 1,889 square feet or 25.2 percent (1,889/7,500) of the Northeast Excavation. As a result, the portion of JM's costs for Northeast Excavation work performed attributable to IDOT's responsibility as defined by IPCB is \$12,583, as shown in Gobelman: Table 1.

Service	Site 3	Site 6	Sites 3 and 6
Professional – Engineering for	\$3,977		
Northeast Excavation			
Professional – Completion	\$10,000		
Costs for Northeast Excavation			
Construction - Base Bid for	\$35,957		
Northeast Excavation			
Total	\$49,934		
IDOT Attribution	\$12,583		

3.4 Dewatering

Service	Site 3	Site 6	Sites 3 and 6
Construction - Base Bid for	\$140,800	\$159,250	
Dewatering			
Construction – T&M for	\$24,325		\$17,675
Dewatering			
Construction – Management for	\$74,530		\$21,500
Dewatering			
Construction Services -	\$19,429	\$1,337	
Payments to Utilities			
Total	\$259,084	\$160,587	\$39,175
IDOT Attribution	\$56,221	\$37,738	\$8,775

3.4.1 Site 3

For Site 3, dewatering was required during the construction of the clean corridor associated with the Nicor line, North Shore Gas line, the City of Waukegan Water Line, and Northeast Excavation. As previously discussed IDOT was not liable for the Nicor line and the City of Waukegan Water Line. IDOT's responsibility as defined by IPCB was proportionate liable for 39.3 percent or \$130,682 of the North Shore Gas line cost within Site 3 and 25.2 percent or \$12,583 of the Northeast Excavation cost.

Service	Site 3	IDOT's Allocation
Nicor Line	\$218,090	\$0
North Shore Gas Line	\$332,524	\$130,682
City of Waukegan Water Line	\$61,037	\$0
Northeast Excavation	\$49,934	\$12,583
Total	\$661,585	\$143,265

To determine the percentage of the work associated with IDOT's responsibility as defined by IPCB liability, I divided the total cost attributed to IDOT's responsibility as defined by IPCB in Site 3 (\$143,265) by the total cost to complete the work for the Nicor line, North Shore Gas line, the City of Waukegan Water Line, and Northeast Excavation (\$661,585). This percentage, 21.7 percent (143,265/661,585), is the percent of the dewatering cost allocated to IDOT's responsibility as defined by IPCB liability. Therefore, JM's total costs for dewatering activities on Site 3 that are attributable to IDOT's responsibility as defined by IPCB totals \$56,221.

3.4.2 Site 6

For Site 6, dewatering was required during the construction of the clean corridor for the north and south side of Site 6. As stated in Mr. Dorgan's report he attributed 50 percent of the dewatering costs to IDOT's responsibility as defined by IPCB. In addition, Mr. Dorgan used soil sampling locations 1S to approximately 9S to define the Site 6 area. The final work plan indicates that the length of the south side of Site 6 is 419 linear feet (from the western end of Site 6 to soil sampling location 9S), as shown on Gobelman: Figure 1. Therefore the total length of dewatering in Site 6 is 838 linear feet (making the length of the north side and south side equal).

The length attributed to IDOT's responsibility as defined by IPCB is 197 linear feet, from where the western edge of Site 6 to halfway between 4S and 5S. The percent of the cost attributed to IDOT's responsibility as defined by IPCB is 23.5 percent (197/838) and the proportionate cost for Site 6 is \$37,738.

3.4.3 Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the cost that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the cost attributed to IDOT's responsibility as defined by IPCB (\$93,959) by the total cost from Sites 3 and 6 (\$419,671). The percentage attributed to the combined Sites 3 and 6 costs is 22.4 percent (93,959/419,671). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB cost is \$8,775.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for dewatering work performed and attributable to IDOT is \$102,734, as shown in Gobelman: Table 1.

3.5 General Site/Site Preparation

The General Site/Site Preparation Task Bucket, according to Mr. Dorgan, includes but is not limited to general project management, support to and interface with regulatory authorities, professional services oversight of construction activities, installation and maintenance of stormwater controls, traffic control, and clearing and grubbing the sites in preparation for construction.

Service	Site 3	Site 6	Sites 3 and 6
Professional – Engineering	\$355,534	\$519,027	
Professional – Completion Cost	\$70,621	\$53,250	
Professional – O&M	\$310,903		
Construction – Base Bid	\$138,310	\$95,560	
Construction – T&M		\$37,410	
Construction – Management			\$74,300
Construction – Misc.	\$57,362	\$102,082	
Total	\$932,730	\$807,328	\$74,300
IDOT Attribution	\$124,676	\$44,403	\$6,538

3.5.1 Site 3

Using the same process as Mr. Dorgan did in his report; I divided the portion of Site 3 cost for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$247,619), by the Site 3 costs for Construction Services (\$1,476,454). The Professional Engineering Services - Engineering percentage is 16.8 percent (247,619/1,476,454). The Professional Engineering Services - Engineering cost attributed to IDOT's responsibility as defined by IPCB on Site 3 is \$59,730.

The same percentage (16.8 percent) utilized for the Professional Engineering Services – Completion Cost on Site 3 equated to \$11,864 to IDOT's responsibility as defined by IPCB.

Using the same percentage (6.5 percent) that is used in the Site 3 vegetative cap installation, the Site Preparation Professional Engineering Services O&M on Site 3 equates to \$20,209 to IDOT's responsibility as defined by IPCB.

The percentage (16.8 percent) utilized for the Construction Services Base Bid on Site 3 equated to \$23,236 to IDOT's responsibility as defined by IPCB.

The percentage (16.8 percent) utilized for the Construction Miscellaneous costs on Site 3 equated to \$9,637 to IDOT's responsibility as defined by IPCB.

Therefore, JM's costs for site preparation on Site 3 that are attributable to IDOT's responsibility as defined by IPCB total \$124,676.

3.5.2 Site 6

Using the same process as Mr. Dorgan did in his report; I divided the portion of Site 6 costs for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$67,505), by the Site 3 costs for Construction Services (\$1,232,059). The Professional Engineering Services - Engineering percentage is 5.5 percent (67,505/1,232,059). The

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Professional Engineering Services - Engineering cost attributed to IDOT's responsibility as defined by IPCB on Site 6 is \$28,546.

The same percentage (5.5 percent) is utilized for the Professional Engineering Services – Completion Cost on Site 6 equated to \$2,929 to IDOT's responsibility as defined by IPCB.

The percentage (5.5 percent) utilized for the Construction Services Base Bid on Site 6 equated to \$5,256 to IDOT's responsibility as defined by IPCB.

The percentage (5.5 percent) utilized for the Construction T&M costs on Site 6 equated to \$2,058 to IDOT's responsibility as defined by IPCB.

The percentage (5.5 percent) utilized for the Construction Miscellaneous costs on Site 6 equated to \$5,615 to IDOT's responsibility as defined by IPCB.

Therefore, JM's costs for site preparation on Site 6 that are attributable to IDOT's responsibility as defined by IPCB total \$44,403.

3.5.3 Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the costs that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the costs attributed to IDOT's responsibility as defined by IPCB (\$48,010) by the total Sites 3 and 6 costs (\$548,602). The percentage attributed to the combined Sites 3 and 6 costs is 8.8 percent (48,010/548,602). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$6,538.

Utilizing the same table Mr. Dorgan created in Exhibit F, the portion of JM's costs for dewatering work performed and attributable to IDOT is \$175,617, as shown in Gobelman: Table 1.

3.6 Health and Safety

3.6.1 Sites 3 and 6

Utilizing Mr. Dorgan's process of calculating the proportionate cost for the cost that could not be segregated to Site 3 or Site 6 alone, the allocation percentage was calculated by dividing the portion of the Construction Services cost attributed to IDOT's responsibility as defined by IPCB (\$48,010) by the total Sites 3 and 6 costs (\$548,602). The percentage attributed to the combined Sites 3 and 6 costs is 8.8 percent (48,010/548,602). As applied to the combined Sites 3 and 6 costs, IDOT's responsibility as defined by IPCB is \$6,776, as shown in Gobelman: Table 1.

3.7 EPA Oversight Costs

Reimbursement cost for USEPA oversight costs.

Service	Site 3	Site 6
EPA Oversight	\$233,805	\$125,675
Total	\$233,805	\$125,675
IDOT Attribution	\$39,279	\$6,912

3.7.1 Site 3

Using the same process as Mr. Dorgan did in his report, the portion of Site 3 costs for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$247,619), by the Site 3 costs for Construction Services (\$1,476,454). Then applying this percentage (16.8 percent) to the cost for USEPA Oversight on Site 3 is \$39,279, as shown in Gobelman: Table 1.

3.7.2 Site 6

Using the same process as Mr. Dorgan did in his report, the portion of Site 6 cost for Construction Services that were attributable to IDOT's responsibility as defined by IPCB (\$67,505), by the Site 3 costs for Construction Services (\$1,232,059). Then applying this percentage (5.5 percent) to the cost for USEPA Oversight on Site 6 is \$6,912, as shown in Gobelman: Table 1.

3.8 Cost for Legal/Legal Support Services

Legal support services were related to negotiation of easements and other agreements for Sites 3 and 6 for required utility work. I did not analyze the attribution or reasonableness of these costs to the allocation process. As calculated in Mr. Dorgan's report, the allocation percentage was calculated by dividing the cost attributed to IDOT's responsibility as defined by IPCB for utility work (\$190,281) by utility related work for Site 3, Site 6, and Site 3/6 (\$1,638,837). The percentage attributed to the legal support services is 11.6 percent (190,281/1,638,837). As applied to JM's cost for Legal Support Services (\$71,840), IDOT's responsibility as defined by IPCB for Legal Support Services is \$8,333, as shown in Gobelman: Table 1.

4 IDOT'S RESPONSIBILITY AS DEFINED BY IPCB ATTRIBUTION SUMMARY

IDOT's responsibility as defined by IPCB cost allocation amounts are presented in the following table:

Task Bucket	Site 3	Site 6	Sites 3 and 6	Total
Nicor Gas	\$0	\$0	\$0	\$0
City of Waukegan Water Line	\$0	\$0	\$0	\$0
AT&T	\$20,426	\$4,548	\$6,329	\$31,303
Utility/ACM Excavation	\$0	\$5,591	\$0	\$5,591
North Shore Gas	\$130,682	\$8,455	\$14,248	\$153,385
Northeast Excavation	\$12,583	\$0	\$0	\$12,583
Dewatering	\$56,221	\$37,738	\$8,775	\$102,734
Ramp	\$0	\$0	\$0	\$0
Filling/Capping	\$27,707	\$11,173	\$18,657	\$57,537
General Site/Site Preparation	\$124,676	\$44,403	\$6,538	\$175,617
Health and Safety	\$0	\$0	\$6,776	\$6,776
USEPA Oversight Cost	\$39,279	\$6,912	\$0	\$46,191
Legal Support	\$0	\$0	\$8,333	\$8,333
Total	\$411,574	\$118,820	\$69,656	\$600,050

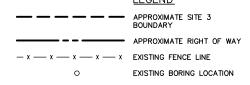
5 IDOT'S RESPONSIBILITY AS DEFINED BY IPCB ATTRIBUTION

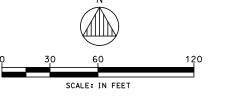
Based on the above table, it is my opinion that \$600,050 of JM's cost (\$5,579,794) incurred on Site 3 and Site 6 are attributable to IDOT in accordance to the IPCB ruling.

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FIGURES

- GRID AND WATER LINE LOCATIONS DERIVED FROM AECOM FINAL REPORT MARCH 20, 2018, FIGURE 2, JM0040322.





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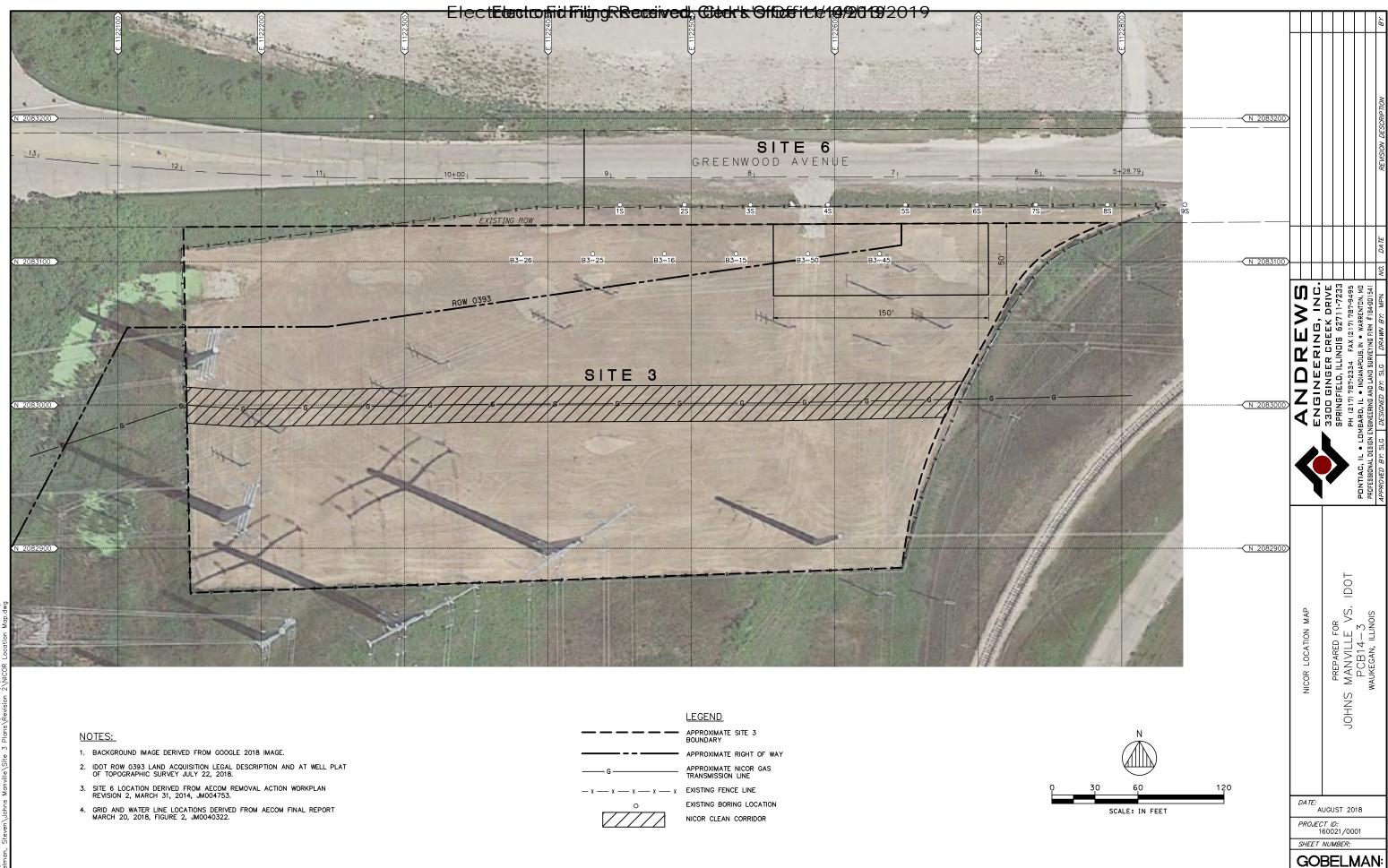
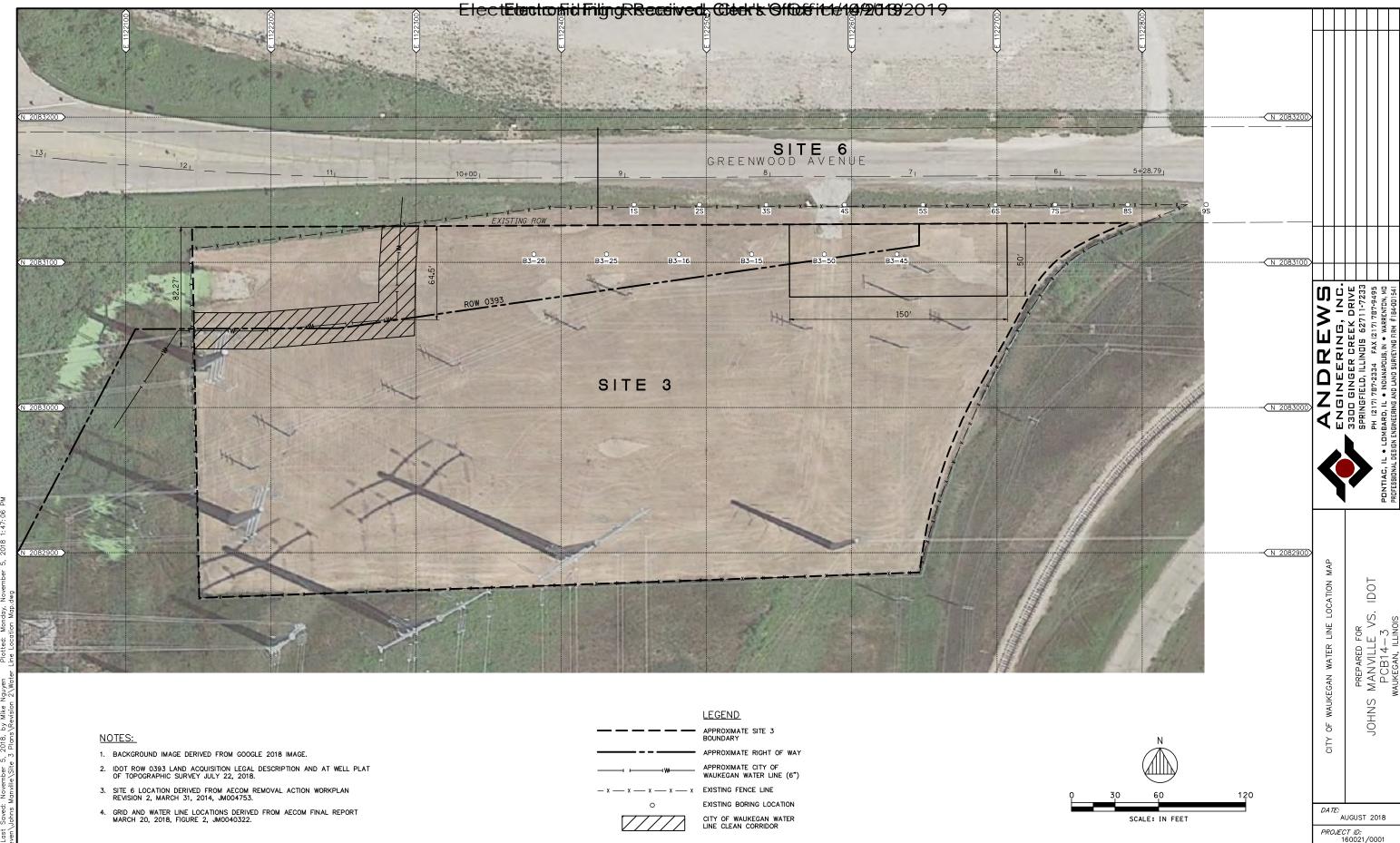
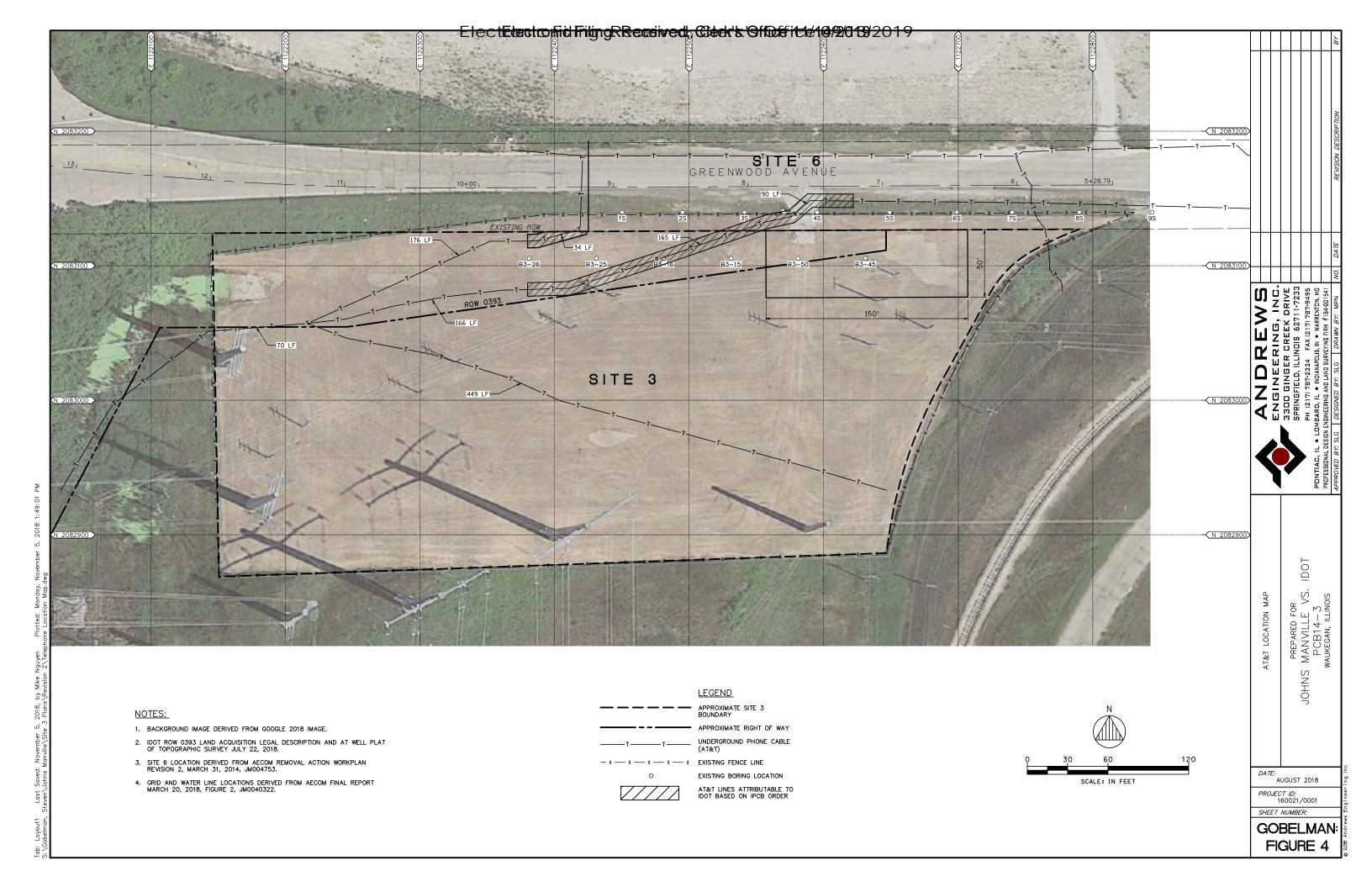


FIGURE 2

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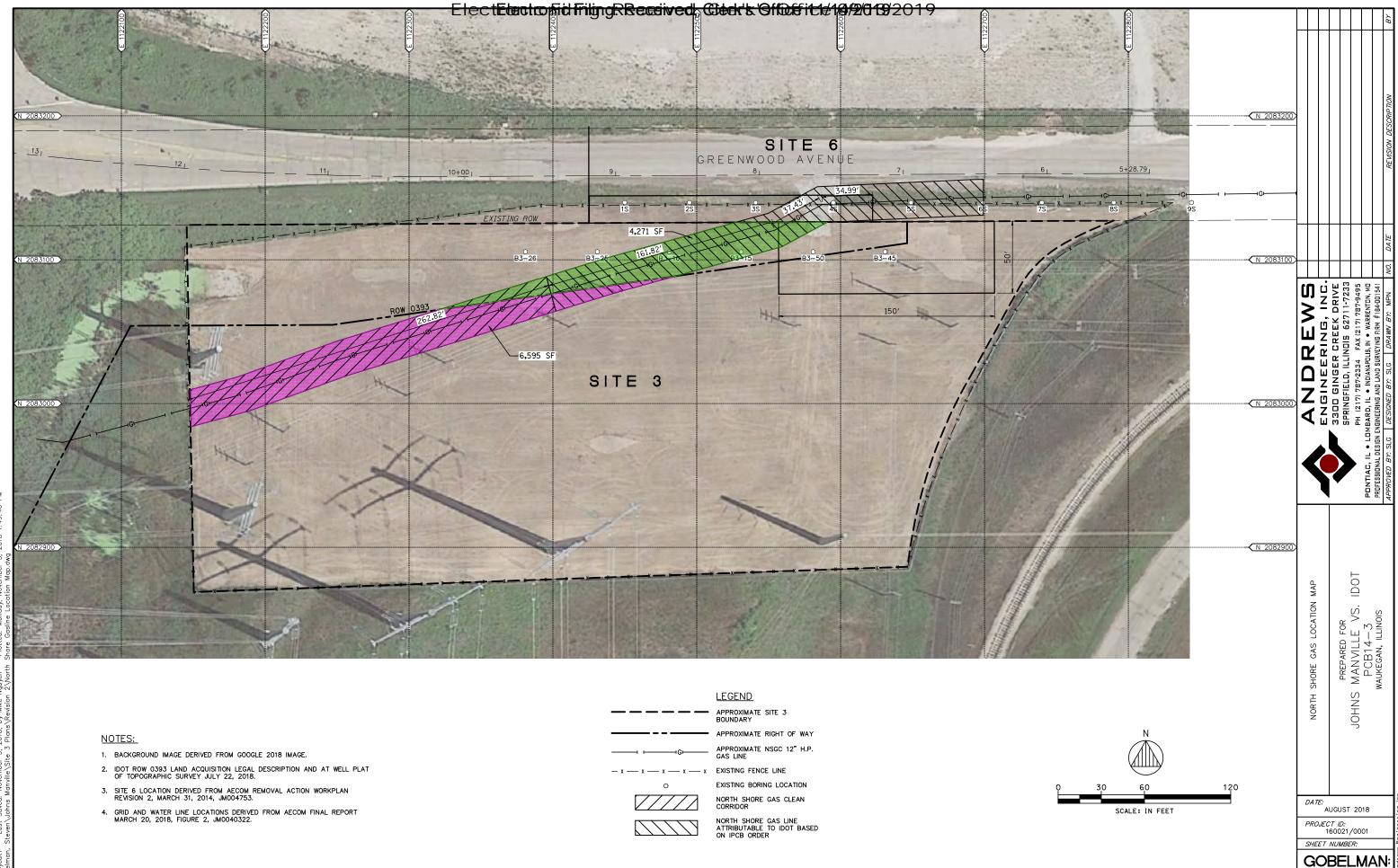


FIGURE 5

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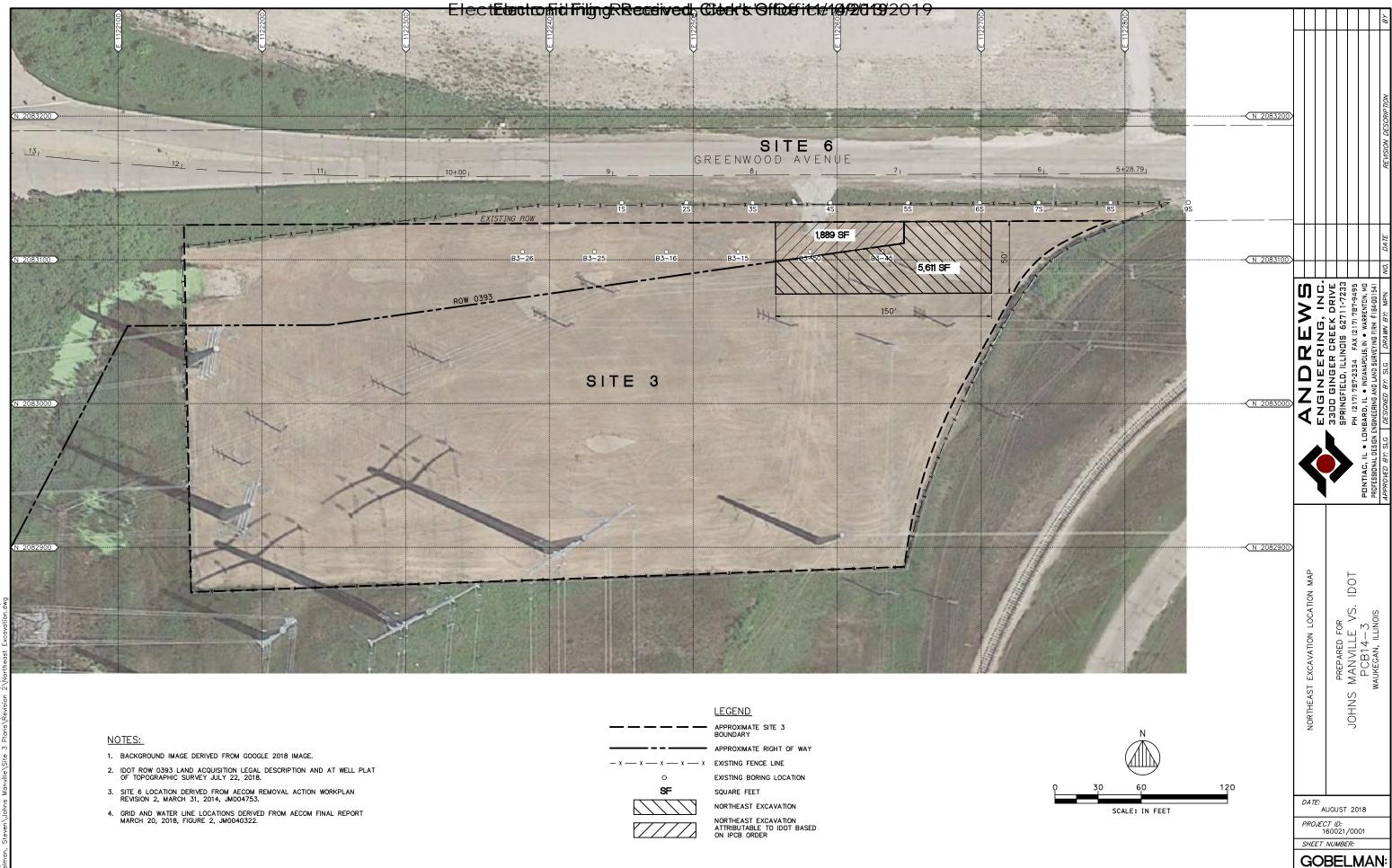


FIGURE 6

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TABLE

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Work/Cost Type							Task Bucket						
Work/Cost Type		Nicor Gas	•	City of Wa	City of Waukegan Water Line			AT&T		ComEd			
	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT	\$ 106,08 0.0		.0% 0.0	\$ 35,867 0.09				1.6%	0.0%	0.0%	0.0%	0.0%	
IDOT Attribution	\$	- \$	- \$	- \$	- \$ -	\$ -	\$ 4,987	\$ 498	\$ -	\$ -	\$ -	\$ -	
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.0	%	.0% 0.0	0.09	6 0.0% - \$ -	6 0.0% \$ -	0.0%	\$ 15,000 1.6% \$ 240	0.0%	0.0%	0.0%	0.0%	
Operations and Maintenance AECOM Estimate	*	•	•	*	*	,				*		•	
Percentage Attribution to IDOT IDOT Attribution	0.0	% - \$.0% 0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Construction Services Campanella Base Bid Percentage Attribution to IDOT IDOT Attribution	\$ 106,84 0.0		.0% 0.0	\$ 25,170		6 0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
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Construction Services Campanella T&M Services Percentage Attribution to IDOT IDOT Attribution	\$ 5,15 0.0		.0% 0.0	0.0%	\$ 38,241 6 0.0% - \$ -	0.0%	0.0%	0.0%	\$ 53,548 6.4% \$ 3,427	0.0%	0.0%	0.0%	
Construction Services DMP Percentage Attribution to IDOT IDOT Attribution	0.0	% C	.0% \$ 36 - \$		6 0.0% - \$ -		\$ 0.0%	\$ 0.0%	\$ 45,350 6.4% \$ 2,902	0.0%	0.0%	0.0%	
Construction Services Miscellaneous Percentage Attribution to IDOT IDOT Attribution	0.0	% C	.0% 0.0	0.0%	6 0.0%		\$ 0.0%	\$ 0.0%	\$ 0.0%	0.0%	0.0%	0.0%	
Construction Services Payments to Utilities Percentage Attribution to IDOT IDOT Attribution	0.0	%	.0% 0.0	0.09	6 0.0%	6 0.0% \$ -	\$ 82,127 18.8% \$ 15,440	1.6%		0.0%	\$ 0.0%	0.0%	
Easement Legal Support Manikas Percentage Attribution to IDOT IDOT Attribution	0.0	%	.0% 0.0	0.09	6 0.0% - \$ -	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	\$ 0.0%	0.0%	
EPA Oversight Percent Attribution to IDOT IDOT Attribution	0.0	% C	.0% 0.0	0.09	6 0.0% - \$ -		0.0%	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	
Total Costs	\$ 218,09	0 \$	- \$ 36	60 \$ 61,037	\$ 86,674	\$ -	\$ 108,651	\$ 284,266	\$ 98,898	\$ -	\$ -	\$ -	
Total IDOT Attribution	\$	- \$	- \$	- s	. \$ -	\$ -	\$ 20,426	\$ 4,548	\$ 6,329	-	-	\$ -	

 AT&T
 4,548 | \$
 6,329 |

 AT&T
 AT&T
 392,917

 IDOT Attribution
 \$
 24,975

 Percent IDOT attribution
 6.4%

 AT&T IDOT Total
 \$
 31,304

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Task Bucket															
Work/Cost Type	Utility/Asbestos Containing Material (ACM) Excavation					No	orth Shore Gas (NS	G)		Northeast Excavation		Dewatering			
	Site 3		Site 6	Site 3 and Site 6	S	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	135,159 39.3% 53,117	3.6%	0.0%	\$ 3,977 25.2% \$ 1,002	0.0%	0.0%	0.0%	0.0% \$ -	0.0% \$ -	
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	0.0%	0.0%	\$ 10,000 25.2% \$ 2,520	0.0%	0.0%	0.0%	\$ 0.0%	0.0% \$ -	
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0%	0.0% \$ -	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0% \$ -	
Construction Services Campanella Base Bid Percentage Attribution to IDOT IDOT Attribution	0.09	\$ % - \$	155,318 3.6% 5,591 \$	0.0%	\$	0.0%	\$ -	0.0%	\$ 35,957 25.2% \$ 9,061	0.0%	0.0%	\$ 140,800 21.7% \$ 30,554	23.5%	0.0% \$ -	
Construction Services Campanella T&M Services Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	\$162,678 39.3% 63,932	0.0%	\$ 22,327 24.5% \$ 5,470		0.0%	0.0%	\$ 24,325 21.7% \$ 5,279	0.0% \$ -	\$ 17,675 22.4% \$ 3,959	
Construction Services DMP Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	0.0%	\$ 35,830 24.5% \$ 8,778		0.0%	0.0%	\$ 74,530 21.7% \$ 16,173	0.0% \$ -	\$ 21,500 22.4% \$ 4,816	
Construction Services Miscellaneous Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	0.0% \$ -	\$ -	
Construction Services Payments to Utilities Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	34,687 39.3% 13,632	\$ 153,833 3.6% \$ 5,538	0.0%	\$ 0.0%	0.0%	0.0%	\$ 19,429 21.7% \$ 4,216	23.5%	0.0%	
Easement Legal Support Manikas Percentage Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	\$ 0.0%	\$ 0.0%	
EPA Oversight Percent Attribution to IDOT IDOT Attribution	0.09	% - \$	0.0%	0.0%	\$	0.0% -	0.0%	0.0%	\$ 0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0% \$ -	
Total Costs Total IDOT Attribution	\$	- \$ - \$	155,318 \$ 5,591 \$		\$ \$	332,524 130,682	\$ 234,861 \$ 8,455	1	1		s -	\$ 259,084 \$ 56,221	\$ 160,587 \$ 37,738	,	

 North Shore Gas (NSG)

 Total NSG Site 3 and Site 6
 \$ 567,385
 Total dewater Site 3 and Site 6
 \$ 419,671

 IDOT Attribution
 \$ 139,137
 IDOT Attribution
 \$ 93,959

 Percent IDOT attribution
 24.5%
 Percent IDOT attribution
 22.4%

 NSG IDOT Total
 \$ 153,385
 Dewatering IDOT Total
 \$ 102,734

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Work/Cost Type										Task Bucket	t				
work/Cost Type	Ramp					Filling and Capping				General Site/Site Pre	paration		Health and Safety		
		Site 3	Si	te 6 Site	e 3 and Site 6	Site	te 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT IDOT Attribution	\$	20,880 0.0%	\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	\$ 355,534 16.8% \$ 59,730	\$ 519,027 5.5% \$ 28,546	0.0%	0.0%	0.0%	0.0%
Professional Engineering Services Completion Costs AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	\$ 70,621 16.8% \$ 11,864	\$ 53,250 5.5% \$ 2,929	0.0%	\$ 0.0%	\$ 0.0%	0.0%
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT IDOT Attribution	\$		\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	\$ 310,903 6.5% \$ 20,209	0.0%	0.0%	0.0%	0.0%	0.0%
Construction Services Campanella Base Bid Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$ \$	328,983 6.5% 21,384	0.0%	0.0%	\$ 138,310 16.8% \$ 23,236	\$ 95,560 5.5% \$ 5,256	0.0%	\$ 0.0%	\$ 0.0%	\$ 77,000 8.8% \$ 6,776
Construction Services Campanella T&M Services Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$ \$	41,721 6.5% 2,712	3.6%	5.3%	0.0%	\$ 37,410 5.5% \$ 2,058	0.0%	\$ 0.0%	\$ 0.0%	0.0%
Construction Services DMP Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$ \$	55,550 6.5% 3,611	\$ 122,170 3.6% \$ 4,398	5.3%	0.0%	0.0%	\$ 74,300 8.8% \$ 6,538	0.0%	\$ 0.0%	0.0%
Construction Services Miscellaneous Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	\$ 57,362 16.8% \$ 9,637	\$ 102,082 5.5% \$ 5,615	0.0%	\$ 0.0%	\$ 0.0%	0.0%
Construction Services Payments to Utilities Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	\$ 0.0%	\$ 0.0%
Easement Legal Support Manikas Percentage Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	\$ 0.0%	0.0%
EPA Oversight Percent Attribution to IDOT IDOT Attribution	\$	-	\$	0.0%	0.0%	\$	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0%
Total Costs	\$	20,880	\$	- \$	-	\$	426,254	\$ 310,353	\$ 352,012	\$ 932,730	\$ 807,329	\$ 74,300	\$ -	\$ -	\$ 77,000
Total IDOT Attribution	\$	-	\$	- \$	-	\$	27,707	\$ 11,173	\$ 18,657	\$ 124,676	\$ 44,403	\$ 6,538	\$ -	\$ -	\$ 6,776

Filling and Capping
Total Fill and Cap Site 3 and Site 6
IDOT Attribution General Site/Site Preparation
Total Construction Cost
Total IDOT Attribution Site 3 \$ 1,476,454 \$ 247,619 Site 3/6 \$ 548,602 \$ 48,010 Site 6 \$ 1,232,059 736,607 \$ 38,879 \$ 67,505 Percent IDOT attribution Fill and Cap IDOT Total 5.3% Percent IDOT Attribution 16.8% 5.5% 8.8% 57,536

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Work/Cost Type			Task E		-		Total Site 3			
		EPA Oversight	1	L	egal Support Servic	es			and Site 6 Costs	
	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	Site 3	Site 6	Site 3 and Site 6	
Professional Engineering Services LFR/Arcadis/AECOM Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 684,027 \$	679,593 \$	- \$	1,363,620
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 118,836 \$	31,961 \$	- \$	150,797
Professional Engineering Services Completion Costs AECOM Estimate	0.000	0.004	0.00/	0.00/	0.004	0.000	\$ 80,621 \$	68,250 \$	- \$	148,871
Percentage Attribution to IDOT IDOT Attribution	\$ -	\$ 0.0%	\$ -	\$ -	\$ -	\$ -	\$ 14,384 \$	3,169 \$	- \$	17,553
Operations and Maintenance AECOM Estimate Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 310,903 \$	- \$	- \$	310,903
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,209 \$	- \$	- \$	20,209
Construction Services Campanella Base Bid Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 776,068 \$	410,128 \$	77,000 \$	1,263,196
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 84,235 \$	48,271 \$	6,776 \$	139,282
Construction Services Campanella T&M Services Percentage Attribution to IDOT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$ 233,880 \$	263,834 \$	325,412 \$	823,126
IDOT Attribution	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 71,923 \$	8,832 \$	25,145 \$	105,900
Construction Services DMP							\$ 130,080 \$	122,170 \$	297,490 \$	549,740
Percentage Attribution to IDOT IDOT Attribution	\$ 0.0%	0.0%	\$ -	\$ -	\$ 0.0%	\$ -	\$ 19,784 \$	4,398 \$	29,403 \$	53,585
Construction Services Miscellaneous							\$ 57,362 \$	102,082 \$	- \$	159,444
Percentage Attribution to IDOT IDOT Attribution	\$ -	0.0%	0.0%	0.0%	0.0% \$ -	\$ -	\$ 9,637 \$	5,615 \$	- \$	15,251
Construction Services Payments to Utilities							\$ 136,243 \$	393,331 \$	- \$	529,574
Percentage Attribution to IDOT IDOT Attribution	\$ 0.0%	0.0%	0.0%	0.0%	\$ 0.0%	0.0%	\$ 33,288 \$	9,663 \$	- \$	42,951
Easement Legal Support Manikas						\$ 71,840	\$ - \$	- \$	71,840 \$	71,840
Percentage Attribution to IDOT IDOT Attribution	\$ -	0.0%	0.0%	0.0%	0.0%	11.6% \$ 8,333		- \$	8,333 \$	8,333
EPA Oversight	\$ 233,805						\$ 233,805 \$	125,675 \$	- \$	359,480
Percent Attribution to IDOT IDOT Attribution	16.8% \$ 39,279	5.5% \$ 6,912		0.0%	0.0%	0.0%	\$ 39,279 \$	6,912 \$	- \$	46,191
Total Costs	\$ 233,805	\$ 125,675	\$ -	\$ -	\$ -	\$ 71,840	\$ 2,642,989 \$	2,165,063 \$	771,742 \$	5,579,794
Total IDOT Attribution	\$ 39,279	\$ 6,912	s -	s -	\$ -	\$ 8,333	\$ 411,574 \$	118,821 \$	69,658 \$	600,052

 Manikas Support Site 3/6
 Site 3
 Site 6
 Site 3 and 6
 Total

 Total costs for utility work
 \$ 720,302
 \$ 761,119
 \$ 157,415
 \$ 1,638,836

 Total IDOT Attribution
 \$ 151,108
 \$ 18,595
 \$ 20,578
 \$ 190,281

 Percent IDOT Attribution
 \$ 11.6%

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Appendix A

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BIBLIOGRAPHY OF DOCUMENTS CITED

1.	Grant o	f Public	: Highway,	. Auaust 3	3. 1971

^{2.} State of Illinois Department of Public Works and Buildings, Division of Highways, Plans for Proposed Federal Aid Highway, F.A. Route 42 – Section 8-HB & 8-VB, Lake County, Contract #28266. 1971.

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Appendix B

Tab: Layout1 Last Saved: November 5, 2018, by Mike Nguyen Plotted: Monday, November 5, 2018 11:47:05 AM S. Achelmon Stawan, Johns Manulla) Site 3, Plans (Revision 2) Remindrize Exhibit 2 Aug.

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Appendix C

FA. Ria 42 Section 8 LAKE Co.

GRANT FOR PUBLIC HIGHWAY

THIS INDENTURE WITNESSETH: That Grantor, COMMONWEALTH EDISON
COMPANY, an Illinois Corporation, for and in consideration of the sum
of Ten and No/100 Dollars (\$10.00) and other good and valuable consideration,
receipt of which is hereby acknowledged, paid by and for the State of
Illinois, Grantee herein, acting by and through the Department of Public
Works and Buildings, hereby grants, but without warranty, subject to the
reservations, conditions and provisions hereinafter contained, unto Grantee
the right to use for highway purposes only, the following tract of land:

Parcel No. 0392 PART A

A part of the Westerly 100 feet of all that part of the Southwest Quarter of the Southwest Quarter of Section 10 in Township 45 North, Range 12 East of the Third Principal Meridian, lying Easterly of the Right of Way of the Chicago and North Western Railway Company, in Lake County, Illinois, described as follows: Beginning at the intersection of the Easterly Right-of-Way line of the Chicago and North Western Railway Company and the South line of the Southwest Quarter of said Section 10; thence North 6° 39' 32" East 305.30 feet, as measured along said Easterly Right of Way; thence North 89° 44' 18" East 35.00 feet; thence North 11° 09' 06" East 194.74 feet; thence North 15° 11' 23" East 202.24 feet; thence North 6° 39' 33" East 101.37 feet; thence South 83° 20' 30" East 20.00 feet to a point on a line 100.00 feet Easterly of the Easterly Right of Way line of the Chicago and North Western Railway Company; thence South 6° 39' 32" West 792.89 feet to a point on the South line of the Southwest Quarter of said Section 10; thence South 89° 44' 18" West 100.73 feet, as measured along the South line of the Southwest Quarter of said Section 10, to the Point of Beginning.

PART B

A part of the Westerly 100 feet of all that part of the West Half of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian, lying Easterly of the Right of Way of the Chicago and North Western Railway Company, in Lake County, Illinois, described as follows: Beginning at the intersection of the Easterly Right of Way line of the Chicago and North Western Railway Company and the South line of Greenwood Avenue, said South line of Greenwood Avenue being 66 feet South of and parallel to the North line of the Northwest Quarter of said Section 15; thence South 6° 39' 32" West 90.0 feet, as measured along the Easterly Right of Way of the Chicago and North Western Railway Company; thence South 13° 02' 59" East, 148.26 feet; thence South 6° 39' 32" West 100.00 feet; thence South 2° 48" 12" East 304.14 feet to a point on the Westerly line of Sand Street; thence North 6° 39' 32" East 641.72 feet along the Westerly line of Sand Street to a point on the South line of Greenwood Ayenue; thence South 89° 44' 16" West,

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100.73 feet along the South line of the Greenwood Avenue, to the Point of Beginning.

PARCEL NO. E392

A part of the Westerly 100 feet of all that part of the Southwest Quarter of the Southwest Quarter of Section 10, Township 45 North, Range 12 East of the Third Principal Meridian, lying Easterly of the Right of Way of the Chicago and North Western Railway Company, in Lake County, Illinois, described as follows: Commencing at the intersection of the Easterly Right of Way of the Chicago and North Western Railway Company and the North line of Greenwood Ayenue, said North line of Greenwood Avenue being 40 feet North of and parallel to the South line of the Southwest Quarter of the Southwest Quarter of said Section 10; thence North 6° 39' 32" East 801.34 feet, as measured along the Easterly Right of Way of the Chicago and North Western Railway Company, to the Point of Beginning; thence South 83° 21' 08" East 100.00 feet; thence North 6° 39' 32" East 120.00 feet; thence North 83° 21' 08" West 100.00 feet to a point on the Easterly Right of Way of the Chicago and North Western Railway Company; thence South 6° 39' 32" West 120.00 feet, as measured along said Easterly Right of Way, to the Point of Beginning.

Parcel No. 0393

A part of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Beginning at the intersection of the Easterly line of Sand Street and the South line of Greenwood Avenue thence North 89° 44' 17" East 643.23 feet as measured along the South line of Greenwood Avenue; thence South 0° 15' 49" East 15.0 feet; thence South 81° 54' 31" West 403.76 feet; thence South 89° 44' 17" West 140.0 feet; thence South 27° 50' 01" West 185.24 feet; thence South 0° 06' 25" East 118.83 feet; thence South 14° 42' 11" West 414.48 feet to a point on the Easterly line of Sand Street; thence North 6° 39' 32" East 758.19 feet as measured along the Easterly line of Sand Street to the Point of Beginning.

Parcel No. E393

A part of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the South line of Greenwood Avenue and the East line of Sand Street thence North 89° 44' 17" East 643.23 feet; thence South 0° 15' 49" East 15.00 feet to the Point of Beginning; thence South 0° 15' 49" East 15.00 feet; thence South 57° 56' 15" West 435.99 feet; thence South 23° 33' 27" West 247.70 feet; thence South 34° 53' 13" West 336.16 feet; thence South 26° 17' 09" West 201.25 feet; thence North 83° 26' 33" East 3.40 feet to a point on the East line of Sand Street; thence North 6° 39' 32" East 189.57 feet as measured along the East line of Sand Street; thence North 14° 42' 11" East 175.00 feet; thence North 41° 26' 36" East 141.13 feet; thence North 17° 14' 26" East 92.57 feet; thence North 1° 03' 41" East 280.32 feet; thence North 27° 50' 01" East 45.00 feet; thence North 89° 44' 17" East 45.00 feet; thence South 1° 00' 09" East 198.14 feet; thence North 53° 41' 32" East 388.50 feet; thence North 81° 54' 31" East 180.00 feet to the point of Beginning.

Parcel No. 0394

A part of the East 300 feet of the South half of the Southeast Quarter of Section 9 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as

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follows: Beginning at the Southeast Corner of the Southeast Quarter of said Section 9 thence South 89° 45' 04" West 300.02 feet, as measured along the South line of the Southeast Quarter of said Section 9 thence North 0° 25' 40" East 105.61 feet; thence South 81° 40' 52" East 37.63 feet; thence South 0° 14' 56" East 20.00 feet; thence North 89° 45' 04" East 46.00 feet; thence North 0° 14' 56" West 20.00 feet; thence North 89° 45' 04" East 61.00 feet; thence North 0° 14' 52" West 120.00 feet; thence North 89° 45' 04" East 157.16 feet to a point on the East line of the South half of the Southeast Quarter of said Section 9; thence South 0° 25' 40" West 220.00 feet as measured along the said East line to the point of Beginning.

Parcel No. E394 PART A

A part of the East 300 feet of the South half of the Southeast Quarter of Section 9 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the East line of the South half of the Southeast Quarter of said Section 9 and the North line of Greenwood Avenue, said North line of Greenwood Avenue being 40 feet North of the South line of the South half of the Southeast Quarter of said Section 9; thence North 0° 25' 40" East 355.00 feet, as measured along the said East line to the point of Beginning; thence North 0°25' 40" East 180.00 feet, as measured along said East line; thence South 40° 20' 50" West 467.50 feet to a point on a line 300 feet West of the East line of the South half of the Southeast Quarter of said Section 9; thence South 0° 25' 40" West 114.39 feet; thence South 81° 40' 52" East 37.63 feet; thence North 41° 28' 28" East 160.78 feet; thence North 42° 03' 04" East 236.58 feet to the Point of Beginning.

Parcel No. E394 PART B

A part of the East 300 feet of the South half of the Southeast Quarter of Section 9 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Beginning at the intersection of the East line of the South half of the Southeast Quarter of said Section 9 and the North line of Greenwood Avenue, said North line of Greenwood Avenue being 40 feet North of the South line of the South half of the Southeast Quarter of said Section 9: thence South 89° 45' 04" West 300.02 feet, as measured along the North line of Greenwood Avenue; thence North 0° 25' 40" East 65.61 feet; thence South 81° 40' 52" East 37.63 feet to the Point of Beginning; thence South 0° 14' 56" East 20.00 feet; thence North 89° 45' 04" East 46.00 feet; thence North 0° 14' 56" West 20.00 feet; thence South 89° 45' 04" West 46.00 feet of the point of Beginning.

Parcel No. E395

A part of the Northwest Quarter of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the South line of Greenwood Avenue, said South line being 40 feet South of the North line of the Northwest Quarter of the Northwest Quarter of said Section 15, and the Westerly Right of Way of the Chicago and North Western Railway Company; thence South 89° 45' 04" West 100.00 feet; thence South 0° 14' 56" East 75.00 feet to the point of Beginning; thence South 0° 15' 44" East 205.00 feet; thence South 89° 44' 15" West 91.00 feet; thence North 0° 15' 45" West 140.51 feet; thence North 89° 46' 04" East 24.98 feet; thence

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North 0° 14' 56" West 64.49 feet; thence North 89° 45' 04" East 66.00 feet to the Point of Beginning.

Parcel No. E395 PART B

A part of Lot 1 of School Trustee's Subdivision of Section 16 in Township 45 North, Range 12 East of the Third Principal Meridian, in Lake County, Illinois, described as follows: Commencing at the Southwest Corner of Lot 6 in Russell H. Edward's Business Sites, being a Subdivision of said Lot 1 in School Trustee's Subdivision thence North 88° 55' 20" East 77.28 feet, as measured along the South line of said Lot 6, to the Point of Beginning; thence South 0° 14' 56" East 36.25 feet; thence North 89° 45' 04" East 100.00 feet; thence North 0° 14' 56" West 37.69 feet to a point on the South line of Lot 7 in said Russell H. Edward's Business Sites; thence South 88° 55' 20" West 100.00 feet, as measured along the South lines of Lots 6 and 7 in said Fussell H. Edward's Business Sites; the the Point of Beginning.

Parcel No. 0395 PART A

A part of the Northwest Quarter of the Northwest Quarter of Section 15 in Township 45 North, Range 12 East of the 3rd Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of the South line of Greenwood Avenue and the Westerly Right of Way of the Chicago and North Western Railway Company thence South 89° 45' 04" West 100.00 feet, as measured along the South line of Greenwood Avenue; thence South 0° 14' 56" East 75.00 feet; thence South 89° 45' 04" West 66.00 feet along a line 75.00 feet South of and parallel to the said South line of Greenwood Avenue; thence North 0° 14' 56" West 75.00 feet to a point on the south line of Greenwood Avenue; thence North 89° 45' 04" East 66.00 feet, as measured along the said South line of Greenwood, to the Point of Beginning.

Said tact of land herein described contains 0.114 Acres, more or less.

Parcel No. 0395 PART B

A part of Lot 1 in School Trustee's Subdivision of Section 16 and a part of the South 300 feet of the North 479.5 feet of that part of Northwest Quarter of the Northwest Quarter of Section 15, lying West of the Westerly line of the right of way of the Chicago and North Western Railway Company, all in Township 45 North, Range 12 East of the 3rd Principal Meridian in Lake County, Illinois, described as follows: Beginning at the intersection of the East line of the Northeast Quarter of said Section 16 and the South line of Lot 9 in Russell H. Edward's Business Sites, being a part of Lot 1 in said School Trustee's Subdivision and a part of the Northwest Quarter of the Northwest Quarter of said Section 15; thence South 89° 55' 20" West 141.77 feet, as measured along the South line of Lots 9 and 8 in said Russell H. Edward's Business Sites; thence South 0° 11' 03" East 52.27 feet; thence South 2° 37' 41" West 200.25 feet; thence South 5° 56' 41" East 48.05 feet; thence North 89° 09' 38" East 310.24 feet; thence North 0° 14' 03" West 144.53 feet; thence North 5° 56' 41" West 100.50 feet; thence North 3° 28' 56" West 54.52 feet to a point on the South line of Lot 10 in said Russell H. Edward's Business Sites; thence South 89° 44° 17" West 150.11 feet, as measured along the South line of Lots 10 and 9 of said Russell H. Edward's Business Sites to the point of beginning.

Said tract of land herein described contains 2.106 acres, more or less.

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Parcel No. 0399

A part of Lots 6, 7, 8 and 9 in Russell H. Edward's Business Sites, being a Subdivision of Lot 1 in School Trustee's Subdivision of Section 16 in Township 45 North, Range 12 East of the Third Principal Meridian, reference being made to the Plan thereof recorded in the Recorder's Office of Lake County, Illinois, in Book of Plats 31 on Page 102; described as follows: Beginning at the intersection of the South line of Greenwood Avenue and the East line of the Northeast Quarter of said Section 16; thence south 89° 45' 04" West 311.83 feet along the North lines of Lots 9, 8, 7 and 6 to a point 49.67 feet East of the Northwest corner of said Lot 6; thence South 14° 53' 01" West 46.61 feet; thence South 80° 47' 07" East 30.47 feet; thence North 89° 45' 07" East 150.00 feet; thence south 0° 14' 56" East 91.54 feet to a point on the South line of said Lot 8; thence North 88° 55' 20" East 141.77 feet along the South lines of said Lots 8 and 9 to a point on the East line of the Northeast Quarter of said Section 16; thence North 0° 38' 46" East 139.51 feet along the East line of the Northeast Quarter of said Section 16 to the Point of Beginning.

Parcel No. E399

A part of Lots 6 and 7 in Russell H. Edward's Business Sites, being a part of Lot 1 in School Trustee's Subdivision of Section 16 in Township 45 North, Range 12 East of the Third Principal Meridian, according to the Plat thereof recorded in Book 31 of Plats, Page 102, in Lake County, Illinois, described as follows: Commencing at the Southwest Corner of said Lot 6 thence North 88° 55' 20" East 77.28 feet, as measured along the South line of said Lot 6, to the Point of Beginning; thence North 0° 14' 56" West 93.71 feet; thence North 89° 45' 07" East 100.00 feet; thence South 0° 14' 56" East 92.27 feet to a point on the South line of said Lot 7; thence South 88° 55' 20" West 100.00 feet, as measured along the South line of Lots 6 and 7 to the Point of Beginning.

Parcel No. 0400

A part of Lots 1 and 2 in School Trustee's Subdivision of Section 16 and a part of the Northwest Quarter of the Northwest Quarter of Section 15 all in Township 45 North, Range 12 East of the Third Principal Meridian in Lake County, Illinois, described as follows: Commencing at the intersection of South line of the Northwest Quarter of the Northwest Quarter of said Section 15 and the Westerly Right of Way of the Chicago and North Western Railway Company thence South 89° 46' 07" West 204.00 feet as measured along the South line of the Northwest Quarter of the Northwest Quarter of said Section 15 to the Point of Beginning; thence North 0° 13' 53" West 204.00 feet; thence North 89° 46' 07" East 73.17 feet; thence North 8° 32' 41" East 82.02 feet; thence North 3° 34' 48" East 150.33 feet; thence North 1° 24'09" East 350.14 feet; thence North 0° 14' 03" West 55.46 feet; thence South 89° 09' 38" West 310.24 feet; thence South 5° 56' 41" East 253.45 feet; thence South 0° 14' 03" East 300.00 feet; thence South 2° 50' 26" East 100.05 feet; thence South 0° 53' 54" East 185.11 feet to a point on the North line of Lot 3 in said School Trustee's Subdivision; thence North 89° 46' 07" East 172.61 feet, as measured along the North line of Lot 3 in said School Trustee's Subdivision and along the South line of the Northwest Quarter of the Northwest Quarter of said Section 15 to the Point of Beginning.

as shown on Exhibit "A", attached hereto and made a part hereof.

Grantor hereby reserves unto itself, its successors and assigns,

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the right to install, operate, maintain renew and remove its or their facilities upon, over and under the surface of said described tracts of land, and to make such other and futher use of said tracts of land, as it or they shall see fit, insofar as is compatible with the use of said tracts of land for highway purposes.

Grantor hereby further reserves the right to trim from time to time such trees, saplings, and bushes as may reasonably be required in the operation and maintenance of said facilities of Grantor, and Grantee agrees not to plant any trees on or near said described tracts of land which can grow into said facilities of Grantor.

This grant is subject to two (2) roadways reserved in deed dated June 8, 1923, recorded on June 13, 1923, as Document #225388, an easement dated June 18, 1936 to the City of Waukegan for a 10-inch sanitary sewer, and an easement dated August 14, 1954, to North Shore Sanitary District for a 39-inch interceptor sanitary sewer. There may be other utility lines, mains, pipelines or other underground facilities in this area, however, the exact location and users are not known to Grantor but this grant is expressly made subject to such lines.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed on this $3\frac{20}{}$ day of August, A.D. 1971.

COMMONWEALTH EDISON COMPANY

TTEST:

Assistant Secretary

1517501

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STATE OF ILLINOIS)

COUNTY OF COOK)

I, William E.. Briars, Jr., a Notary Public, in and for said County and in the State aforesaid, DO HEREBY CERTIFY that GLEN W. BEEMAN ASSISTANT Secretary, respectivly, of COMMONWEALTH EDISON COMPANY, a corporation, and also known to me to be the persons whose names are subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that as such Vice President and Assistant Secretary respectively, they signed, sealed and delivered the said instrument as the free and voluntary act of said corporation, for the uses and purposes therein set forth, and that they were duly authorized to execute the same by the board of directors of said corporation.

Given under my hand and notarial seal this 3 20 day of AUGUST , A.D. 1971.

Notary Public

My Commission Expires AUGUST 3, 1974

1517501

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OFFICE LAKE COUNTY, ILLINOIS

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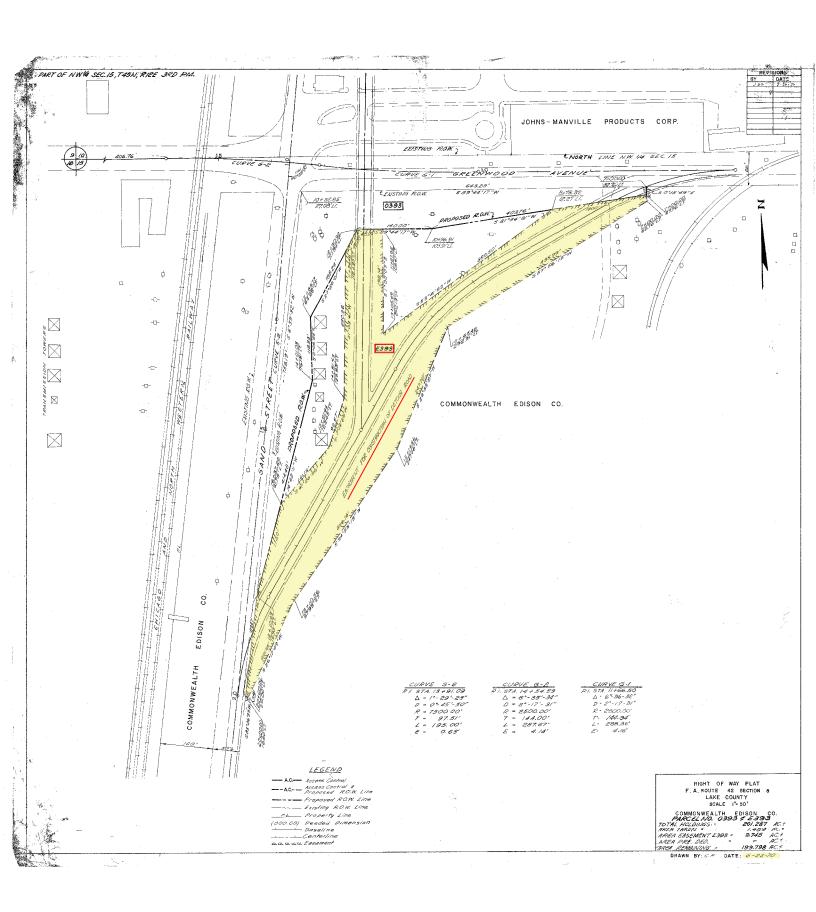


EXHIBIT G

April 30, 2019

EXPERT REBUTTAL SUPPLEMENTAL REPORT OF DOUGLAS G. DORGAN JR. ON DAMAGES ATTRIBUTABLE TO IDOT

JOHNS MANVILLE VS ILLINOIS DEPARTMENT OF TRANSPORTATION

Former Johns Manville Facility Site 3 and Site 6 Waukegan, Illinois

PREPARED BY



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TABLE OF CONTENTS

1	INTRODUCTION	2
	1.1 Summary	
	1.2 Information Considered	
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2	REBUTTAL OPINIONS	3
	2.1 The Gobelman Supplemental Report Base Map is Inaccurate and was Create	ed
	Using Flawed Methodology	3
	2.2 Owing to an Inaccurate Base Map, Gobelman's Attribution Approach is	
	Flawed and Incorrect	4

LIST OF FIGURES

Figure 1A – Property Boundary Layout

Figure 1B – Property Boundary Layout - Detail

1 INTRODUCTION

1.1 Summary

This Expert Rebuttal Supplemental Report presents my response to the Expert Rebuttal Supplemental Report of Steven L. Gobelman, dated November 7, 2018 (herein referred to as the "Gobelman Supplemental Report"). I am rebutting information presented by Mr. Gobelman in the Gobelman Supplemental Report and in his deposition dated February 7, 2019. The opinions expressed in my June 13, 2018 Expert Report of Douglas G. Dorgan Jr. on Damages Attributable to IDOT ("Dorgan Expert Report"), my October 25, 2018 Expert Rebuttal Report of Douglas G. Dorgan Jr. on Damages Attributable to IDOT ("Dorgan Expert Rebuttal Report") and this rebuttal supplemental report ("Dorgan Expert Rebuttal Supplemental Report") are made to a reasonable degree of scientific certainty. I reserve the right to supplement this report, my Dorgan Expert Report, and my Dorgan Expert Rebuttal Report, if additional, relevant information becomes available. The opinions and other material contained in my Dorgan Expert Rebuttal Report dated October 25, 2018 remain valid, as Mr. Gobelman has stated that all of his opinions in his initial Expert Report continue to be his opinions. The opinions expressed in my Dorgan Expert Rebuttal Report are incorporated herein by reference.

1.2 Information Considered

For purposes of this report, in addition to reviewing the documents presented within the Gobelman Supplemental Report and those noted in my Dorgan Expert Report and Dorgan Expert Rebuttal Report, I have reviewed:

- 1. Documents produced in response to a document request sent to Mr. Gobelman
- 2. The deposition transcript and exhibits of Mr. Gobelman taken on February 7, 2019, and
- 3. The deposition transcript and exhibits of Mr. Nguyen taken on March 20, 2019.

Specific information from these sources referenced herein have been cited within this Dorgan Expert Rebuttal Supplemental Report.

2 REBUTTAL OPINIONS

The following provides my expert rebuttal supplemental opinions, followed by information supporting these opinions:

2.1 The Gobelman Supplemental Report Base Map is Inaccurate and was Created Using Flawed Methodology

Based upon information presented in the Gobelman Supplemental Report, and testimony provided during his February 2019 deposition, the Gobelman Supplemental Report was generated to correct the location of Parcel 0393 as shown on the base map created and presented as Figure 1 in the Gobelman Expert Rebuttal Report dated August 22, 2018. In my Dorgan Expert Rebuttal Report, I explained how Figure 1 in the Gobelman Expert Rebuttal Report was flawed (Section 2.1). After bringing the inaccuracy to Mr. Gobelman's attention, he attempted to correct the mistake by presenting a new Figure 1 in his Supplemental Report.

While I believe that certain changes did correct former inaccuracies, the final product presented as Figure 1 in his Supplemental Report continues to be flawed and therefore, even under his own attribution methodology, impacts his attribution of IDOT costs such that they are incorrect. Mr. Gobelman corrected the boundary of Parcel 0393, but he relied on flawed methodology to create his Figure 1, including moving the locations of the borings and test pits represented on his figure. Mr. Gobelman, with support from Mr. Ngyuen, fixed the position of the borings and test pits to the line representing the northern boundary of Site 3 (also the northern boundary of Parcel 0393). This is not valid. The correct location of the borings and test pits is not a function of how the northern boundary of Parcel 3 is moved but should be in a fixed location that is based on the mapping provided by AECOM and adopted by the parties as evidence in the first hearing.

In addition to incorrectly representing the location of the borings and test pits, Figure 1 of the Gobelman Supplemental Report changes the location and dimensions of the Northeast Excavation, as well as the location of the North Shore Gas Line and City of Waukegan Water Line. The positioning of these features on Figure 1 of the Gobelman Supplemental Report misrepresents their actual location. For example, based upon information presented in AECOM figures produced upon completion of the clean corridor for the City of Waukegan Water Line¹, the Water Line was located north of the boundary of Parcel 0393, placing the entire length of the clean corridor within Parcel 0393. The incorrect representation of these features subsequently influences his presentation of IDOT's cost attribution with respect to the various features.

I have produced the attached Figure 1A and 1B that provide a comparison of the various representations of the Site 3 and Site 6 boundaries, boring and test pit locations, the location of the Northeast Excavation, and the location of the City of Waukegan Water

¹ Plat of Topographic Survey, Atwell Hicks, June 23, 2013 Update

Line. It compares the location offered by Mr. Gobelman in his Expert Rebuttal Report of August 22, 2018, his Expert Rebuttal Supplemental Report of November 7, 2018, and my Figure 1 contained in the Dorgan Expert Report (also presented as Figure 2 within the Dorgan Expert Rebuttal Report). Figure 1 of the Dorgan Expert Report was based upon the AECOM base map used by AECOM, provided to IEPA and USEPA and adopted by this Board in the first hearing. I believe Figures 1A and 1B are accurate based upon the Global Positioning System (GPS) coordinates for the Site 6 excavation locations presented in the documents produced.

2.2 Owing to an Inaccurate Base Map, Gobelman's Attribution Approach is Flawed and Incorrect

After reviewing Mr. Gobelman's Report and deposition, I affirm my opinions and methodology in my Dorgan Expert Report and Dorgan Expert Rebuttal Report, which take into consideration the way in which the work was performed at the Sites and the way the Board crafted its Order by referencing areas and soil borings. To the contrary, Mr. Gobelman's methodology for creating an entirely new Base Map was incorrect in multiple ways, including that he used multiple sources that he admits are inconsistent with one another and that lack a common point of reference. His decision to create an entirely new Base Map contradicts his previous presentations having adopted the AECOM Base Map at the first hearing. Indeed, it is clear from Mr. Gobelman's own work that Figure 1 of the Dorgan Expert Report was based upon the AECOM base maps relied upon by all parties and the Board at hearing. It appears that his decision to change the Base Map was motivated out of a desire to influence the allocation amounts. Since he adapts all the Opinions in his Initial Report and his Supplemental Report, his opinions are in conflict because they are based upon two different Base Maps. Based on my review of the record, his Base Map is based on incorrect source information, including, but not limited to, ELM's draft soil boring map.

As noted in my Dorgan Expert Rebuttal Report², Mr. Gobelman and I agree on how JM's Implementation Costs were tabulated and allocated to Site 3 and Site 6. There appears to be no dispute over the total amount of Implementation Costs incurred by JM, the reasonableness of those Implementation Costs, that JM paid those Implementation Costs, how I assigned those Implementation Costs into task buckets, how I allocated those Implementation Costs between Sites 3 and 6, and/or how I assigned and attributed the collective Site 3 and 6 Implementation Costs. Mr. Gobelman agrees with the methodology on these points and incorporates it in the Gobelman Report³. Our opinions, however, diverge on how the Implementation Costs are "attributed" to IDOT. I continue to believe that my approach is more reasonable and accurate.

Since allocation of the Implementation Costs attributed to IDOT remains the primary source of disagreement, aligning those costs with what was driving the remedy, and the ruling of the Board that references areas and soil borings becomes very important. As

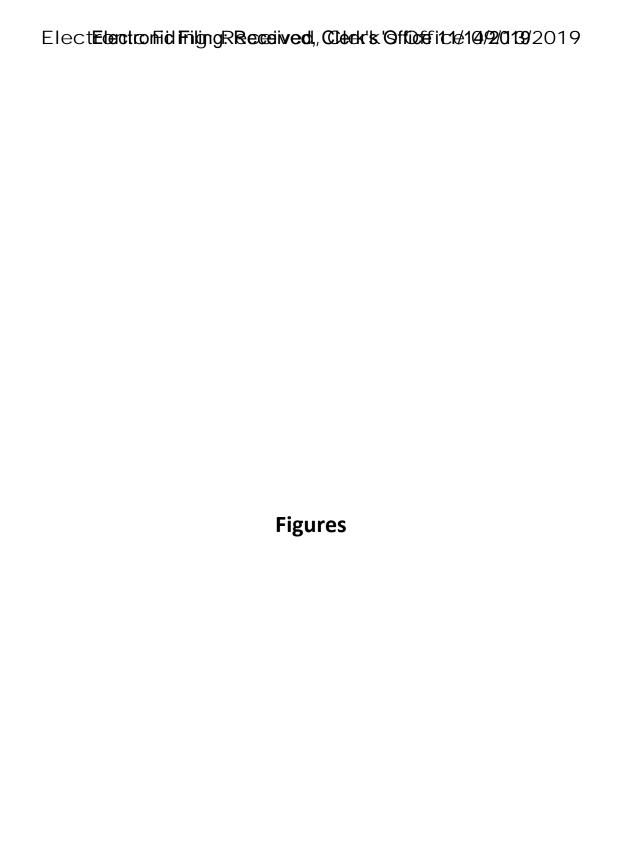
² Section 2.1 of Dorgan Expert Rebuttal Report

³ Section 3 and 4 of Gobelman Expert Rebuttal Report

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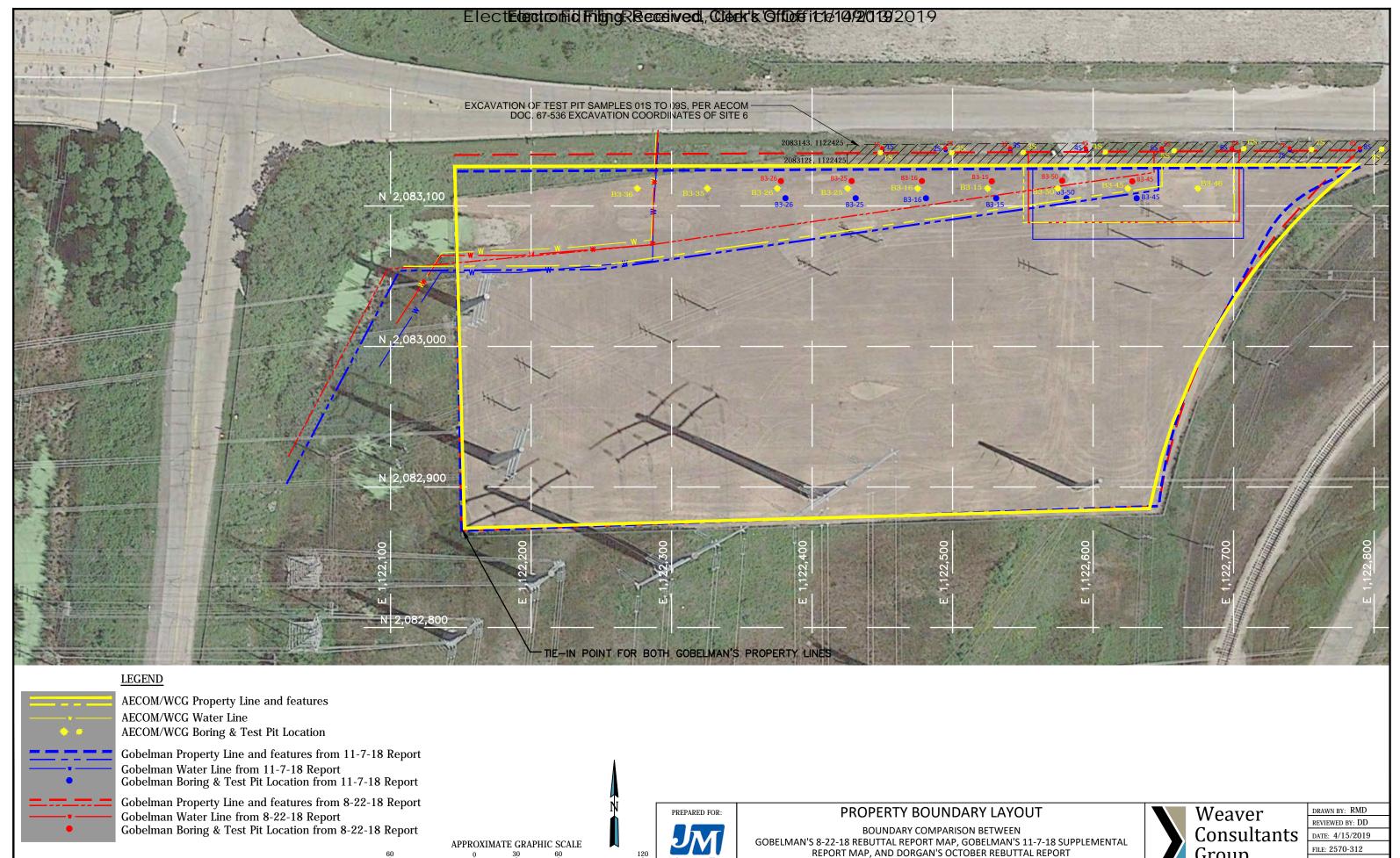
noted above in Section 2.1, Gobelman's understanding of the relationship between the work completed and the areas and soil borings referenced in the Board Ruling is flawed since his Base Map (Figure 1 of Gobelman Expert Rebuttal Supplemental Report) does not place many of the relevant site features and borings in the correct locations and was based upon a flawed methodology.

As a result, his cost allocations are incorrect. For example, as I did, he should attribute all of the City of Waukegan Water Line costs to IDOT. As another example, he continues to incorrectly show Boring B3-45 as being outside the Parcel 0393 boundary, which subsequently influences his attribution of costs for the Northeast Excavation. His use of inconsistent sources and methods to create base maps and his incorrect placement of certain site features leads to an underestimated allocation of costs to IDOT. His attribution costs for the other utilities, even using his own flawed method, is likewise incorrect. Since his Base Map is flawed, he has misattributed the costs to IDOT, even using his own improper attribution approach.



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Figure 1A Property Boundary Layout



1 inch = 60 ft.

SOURCE: IMAGE ADAPTED FROM GOOGLE EARTH IMAGERY DATED JULY 6, 2018

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REUSE OF DOCUMENTS

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Group CHICAGO, ILLINOIS (312) 922-1030 www.wcgrp.com

CAD: Gobelman site.dwg Figure 1A

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Figure 1B Property Boundary Layout - Detail

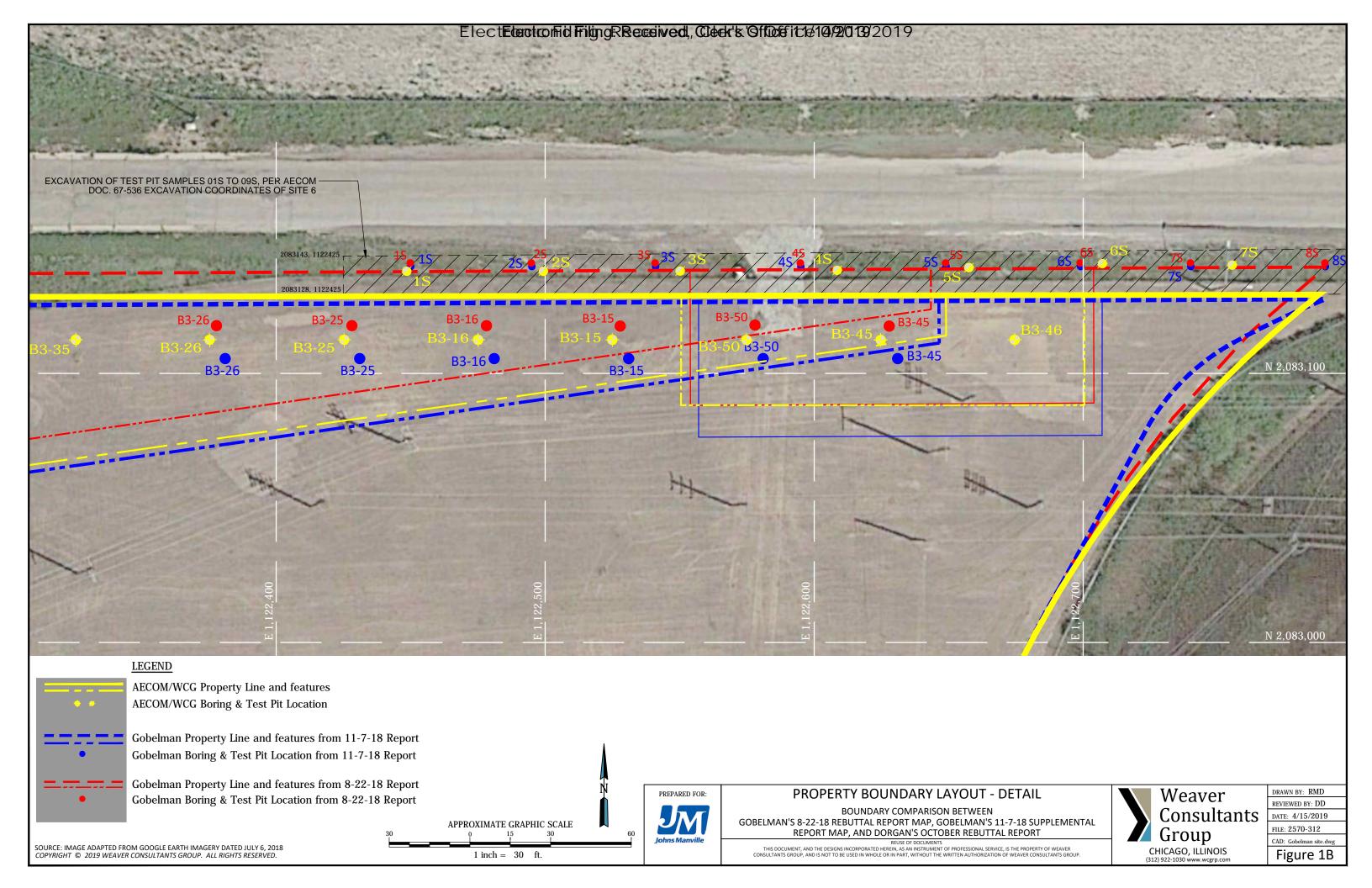


EXHIBIT H

EXHIBIT I

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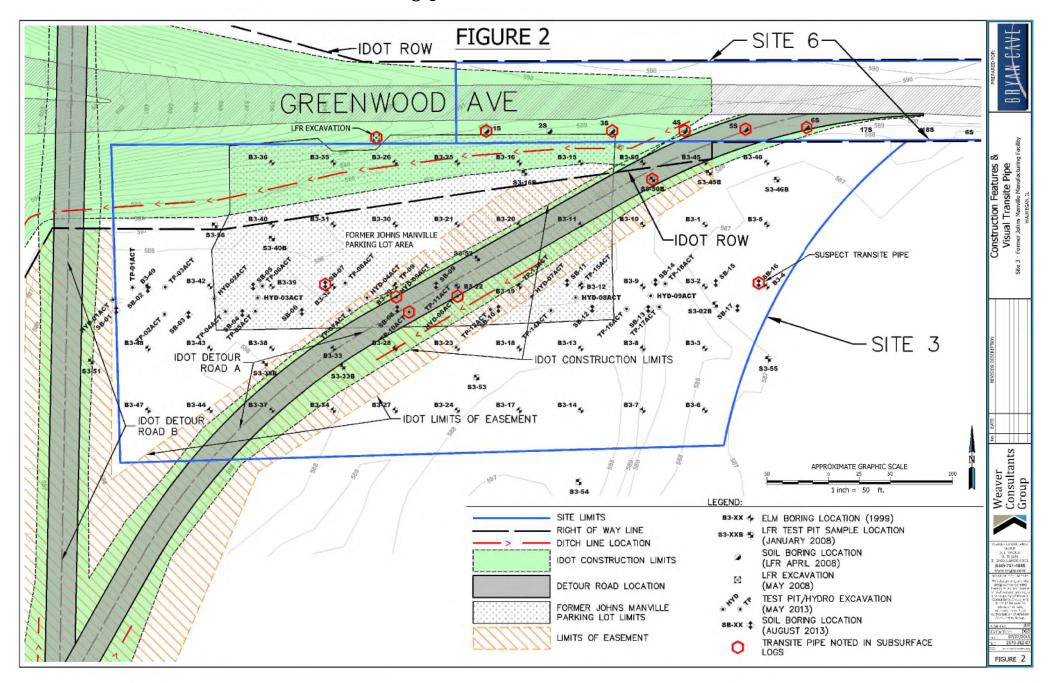


EXHIBIT J

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)
JOHNS MANVILLE, a Delaware corporation,)))
Complainant,) PCB No. 14-3
v.)
ILLINOIS DEPARTMENT OF TRANSPORTATION,)))
Respondent.)

AFFIDAVIT OF DOUGLAS G. DORGAN, JR.

- I, Douglas G. Dorgan, Jr., hereby declare and state as follows:
- 1. I am over the age of twenty-one, of sound mind, and am capable of making this declaration.
- 2. I am currently a Principal with Weaver Consultants Group. I have been responsible for managing the Environmental Practice Group, and the Site Building and Infrastructure Consulting Practice Group. In these positions, I have personal knowledge about what types of records environmental consulting experts and engineering experts typically and reasonably rely upon in assessing the costs associated with clean-up of contamination on a particular site and in creating surveys and accurate maps, figures and drawings for environmental purposes, including but not limited to, creating maps documenting the location of investigation and remediation work. If called as a witness, I can competently testify to the matters stated herein. The statements set forth in this affidavit are true and correct, to the best of my knowledge and belief based upon my experience as an environmental consultant and expert.

- 3. In preparing my expert reports in this matter, I reviewed, among other things: (a) a number of environmental and engineering reports, figures and drawings from other environmental consultants and engineers, including AECOM and IDOT; (b) invoices, payment records and summary reports of costs prepared by those who conducted the environmental investigation and remediation work at Site 3 and Site 6; (c) communications involving United States Environmental Protection Agency ("USEPA"); and (d) draft and final drawings created in AutoCAD at my direction by technicians at Weaver Consultants Group, who are trustworthy and qualified to prepare such drawings and who used reliable sources to create such drawings. Each of these categories of documents are the types of documents reasonably relied upon by experts in the environmental consulting field.
- 4. It is customary for experts in the environmental consulting field to work with trustworthy technicians experienced in AutoCAD to prepare maps, drawings and figures for an expert's use, which are based upon information obtained from reliable sources, such as the environmental consultants or engineers that conducted or oversaw the work being depicted in the maps, drawings or figures.
- 5. Environmental experts do not typically rely on draft maps, maps that lack northings and eastings, or very difficult-to-read maps to create base maps, especially when more reliable maps are readily available.
- 6. When creating a base map for environmental or engineering purposes, it is well-established that reliable sources of information originate with the entity that conducted the underlying environmental or engineering work, especially if that work has been accepted by a regulatory agency.

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7. Experts in my field routinely rely on maps, drawings and figures that are approved

by federal regulatory agencies, including the USEPA. During the first five-day hearing, I testified

about Hearing Exhibits 06-26 and 16-18. These exhibits were based upon maps, figures and

drawings created by AECOM.

8. The exhibits used by both myself and Mr. Steven Gobelman during the first

Hearing relied upon the same AECOM maps, figures and drawings as source material.

9. Following the first five-day hearing, I created new figures for my three expert

reports furnished in the damages phase of this matter. My base map is contained in my June 16,

2018 Expert Report ("Dorgan 1") and is founded upon maps, drawings and/or figures created by

AECOM. Dorgan 1 was then used as a template for the other figures contained in my three reports.

10. The only material difference between Hearing Exhibits 06-26 and 16-18 and

Dorgan 1 is the addition of the areas where work was done as depicted in AECOM's Remedial

Work Plan and Final Report, including but not limited to, the location of the excavation utility

work.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil

Procedure, the undersigned certifies that the statements set forth in this instrument are true and

correct, except as to matters therein stated to be on information and belief and as to such matters

the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: August 29, 2019

Douglas G. Dorgan, Jr.

EXHIBIT K

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ILLINOIS POLLUTION CONTROL BOARD July 12, 2016

STATE OF ILLINOIS
Pollution Control Board

JOHNS MANVILLE, a Delaware)	
corporation,)	
)	
Complainant,)	
) PCB 14-3	
v.) (Enforcement)	
)	
ILLINOIS DEPARTMENT OF)	
TRANSPORTATION,		
)	
Respondent.)	

HEARING REPORT

On May 10, 2016, a hearing was commenced in Room 11-512 of the James R. Thompson Center, 100 West Randolph Street, Chicago, Illinois (JRTC) in the above-captioned matter and continued on record to May 23, 2016, Room 9-31 of the JRTC. The hearing was again continued on record to May 24, 2016, Room 9-34; May 25, 2016, Room 9-31; June 23, 2016, Room 9-31: and June 24, 2016, Room 2-25. All of the hearings were held at the JRTC. Attorneys Susan Brice and Lauren Caisman appeared on behalf of the complainant Johns Manville (JM). Attorneys Evan McGinley and Ellen O'Laughlin appeared on behalf of the respondent, Illinois Department of Transportation (IDOT).

Exhibits

A list itemizing the parties' exhibits and status is attached to this order.

Briefing Schedule

A post-hearing briefing schedule was addressed at the conclusion of the hearing on June 24, 2016 and is as follows: JM's post-hearing brief is due to be filed on or before August 12, 2016; IDOT's post-hearing brief is due to be filed on or before September 16, 2016; JM's reply is due to be filed on or before October 7, 2016. Public Comment must be filed on or before July 25, 2016.

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IT IS SO ORDERED.

Bradley P. Halloran Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, Illinois 60601 312.814.8917

Brad.halloran@illinois.gov

Exhibit	Description (*enlarged version available)	Status
2B	IDOT's Answer to Complaint 10/6/14	Admitted
2C	IDOT's Answer to Second Amended Complaint 4/12/16	Admitted
3A	IDOT's Responses to JM's Fist Set of Document Requests	Admitted
3F	IDOT's Responses to JM's Third Set of Interrogatories	Admitted
3G	IDOT's Revised Responses to Third Set of Interrogatories	Admitted
3H	IDOT's Verifications to Responses to JM's Third Set of Interrogatories	Admitted
31	IDOT's Responses to JM's First Set of Requests for Admission	Admitted
4A	Deposition of Douglas Dorgan with Exhibits 5/6/15	Admitted
4B	Deposition of Douglas Dorgan with Exhibit 9/29/15	Admitted
4C	Deposition of Steven Gobelman with Exhibit 7/10/2015	Admitted
4d	Deposition of William Clinton with Exhibits 10/28/15	Admitted
4E	Deposition of John Baczek with Exhibits 4/25/16	Admitted
4G	Deposition of James Stumpner with Exhibits 4/26/16	Admitted
4H	Deposition of Keith Stoddard April 28, 2016	Admitted
41	Deposition of Joseph Fortunato Jr. 5/9/16	Admitted
5	Letter to Michael Forti from Susan Brice 7/11/13	Admitted
6	Expert Report of Douglas Dorgan 3/16/15	Admitted
7	Affidavit of Douglas Dorgan 2/15/16; JM's Responses to IDOT's Motions in Limine	Admitted
8	Expert Rebuttal Report of Steven Gobelman 5/29/15	Admitted
12	Emails between Keith Stoddard and Mathew Dougherty 2/25/16; Steven Warren and Keith Stoddard 5/20/15	Admitted
13	Email between Keith Stoddard and Steven Warren with Grant For Public Highway 1/16/74	Admitted
15	Right of Way Plat	Admitted
16	*Expert Rebuttal Report of Douglas Dorgan 7/27/2015 (*16-17)	Admitted
18	Expert Report of Joseph Fortunato Jr. with Exhibits 5/3/16	Admitted
19	Excerpts from IDOT Standard Specification for Road and Bridge Construction 9/3/71	Admitted
20	Notice to Bidders, Specifications, Proposed Contract and Contract Bond 9/3/71	Admitted
21A	*As Built IDPW Plans for Proposed Federal Aid Highway F.A. Route 437 – Section 8 – HB&i-VB Lake County (*21A-1, 8, 23, 24, 26, 71)	Admitted
21B	As Built IDPW Plans for Proposed Federal Aid Highway F.A. Route 437 – Section 8 – HB&i-VB Lake County (IDOT 003355-003447)	Admitted
25	Letter to R. Schmidt to S. Ziejewski 11/15/71	Admitted
26	Schedule of Prices	Admitted
28	Letter to G. Moberly to R. Schmidt 5/25/72	Admitted
29	Supervision Engineering Report 10/17/72	Admitted
31	Memo and Authorization for Contract Changes 10/19/72	Admitted
32	Authorization for Contract Changes 11/14/73	Admitted

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33	Explanation for Deviations from Contract	Admitted
34	Letter to R. Schmidt from S. Ziejewski 9/30/74	Admitted
35	Authorization for Contract Changes 5/5/75	Admitted
36	Job Completion Notice 2/18/76	Admitted
37	Letter to Johns Manville from G. Gianelli and Report from Property Insight 12/30/15	Admitted
38	Letter and Resolution re: Joint City State Improvement Route 137 10/20/65	Taken as Offer of Proof
40	Letter and Resolution re: Joint County State Improvement Route 137 4/7/66	Admitted
41	Grant for Public Highway 8/3/71	Admitted
42	Grant for Public Highway notarized 1/16/74	Admitted
43	Letter to S. Ziejeswki from ComEd with attachment of Grant for Public Highway 7/24/84	Admitted
44	Highway Jurisdiction Guidelines for Highway and Street Systems 3/06	Admitted
46	Revision of Title Commitment prepared for IDOT 3/30/16	Admitted
47	March 31, 2016, e-mail from Keith Stoddard to Evan McGinley	Admitted
49	Access Agreement between JM and the City of Waukegan 2/12/08	Admitted
50	License Agreements From Commonwealth Edison Company 11/16/56, 11/1/61 and Affidavit of Brent Tracy 4/13/16	Admitted
52	*Photograph of Aerial Photo late 1950s	Admitted
53A	Aerial Photograph 1961	Admitted
53B	Aerial Photograph 1972	Admitted
53C	*Aerial Photograph 2014	Admitted
53K	*Aerial Photograph 1974	Admitted
53L	*Aerial Photograph 1967	Admitted
53N	Aerial Photograph 1954	Admitted
53P	Aerial Photograph 1939	Admitted
54A	Aerial Photograph 1939	Admitted
54E	Aerial Photograph 1972	Admitted
54Q	Aerial Photograph 10/26/72	Admitted
54R	Aerial Photograph 10/26/72	Admitted
545	*Aerial Photograph 1970	Admitted
54T	Aerial Photograph 6/11/70	Admitted
56	Emails between S. Gobelman and P. McQuillan and attached topographic maps 12/16/13	Admitted
57	ELM Subsurface Characterization Report 12/99	Admitted
58	Letter from USEPA to K. Brown of IDOT and 104(e) Request Attachment 9/29/00	Admitted
59	IDOT Memo from E. Gower to K. Brown regarding 104e Request 11/16/00	Admitted
60	IDOT 104(e) Response 11/27/00	Admitted
62	Administrative Order on Consent 6/11/07	Admitted
63	EE/CA Revision IV and all attachments by Arcadis 4/11	Admitted

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65	USEPA Enforcement Action Memorandum 11/30/12	Admitted
66	Cover Letter and Removal Action Work Plan Revision II 3/31/14	Admitted
67	Cover Letter and Removal Action Work Plan Revisions IV comparison with previous RAWP 2/16	Admitted
68	Estimate of Cost and Authority to Work Special Construction Charge and Invoice	Admitted
69	Email from Tat Ebihara to Doug Dorgan with attachments 3/12/15	Admitted
71	Letter from Tat Ebihara to B. Tracy, D. Clinton with attachments 1/25/16	Admitted
73	Letter from USEPA to AECOM 9/26/14	Admitted
74	Letter to John Van Vranken from LFR with attachments 7/8/08	Admitted
75	Preliminary Environmental Site Assessment 4/21/11	Admitted
76	IDOT Manual	Admitted
77	IDOT Project Report Illinois Route 137 (Greenwood Avenue) Over Illinois Route 137 (Amstutz Expressway) 6/12	Admitted
78	JM Response to 104(e) Request 7/1/99	Admitted
80	Illinois Beach State Park Final Report of Findings 1/20/06	Admitted
81	The Illinois Environmental Protection Act and Board Regulations (historical)	Admitted
84	Soil Boring Cross Sections Figures 5/5/16	Admitted
85	Grant for Public Highway dated April 6, 1984	Admitted
89	Johns Manville Notice of Deposition for Person Most Knowledgeable Pursuant to Rule 206 4/12/16	Admitted
90	*Sidwell Maps (*90-2)	Admitted
91	201(K) Email and attachment from Susan Brice to Evan McGinley 11/11/14; Letter from E. McGinley to S. Brice re 201(k) 12/2/14	Admitted
92	Authorization for Contract Change 8/13/73	Admitted
93	Request for Authorization 10/18/71; Document from W.E. Baumann relating to sewer Approval 10/28/71	Admitted
94	Shoo Fly Road Proposal 10/26/71	Admitted
95	Engineer's Report 8/2/72	Admitted
96	*Demonstrative: Remedial Scope and Cost Analysis Comparison	Admitted
102	Second Five-Year Review Report prepared by USEPA for Johns Manville 5/2/03	Admitted
107	Topographical Map, 1939	Admitted
120	USEPA Comments on Engineering Evaluation Cost Analysis Report Revision 2/3/10	Admitted
129	AECOM Removal Action Work Plan for Southwestern Site Area, Sites 3m 4/5, and 6, Waukegan, Illinois 11/13	Admitted
141	Change Order for Special Excavation 11/10/71	Admitted
162	Quitclaim Deed 4/18/1895	Admitted
163	Quitclaim Deed 1/20/1915	Admitted
164	*Cross Section A-A; Cross Section B-Band Greenwood Avenue 5/16 (*EX 202) Demonstrative	Admitted

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200	*Cover page of as built drawings, enlarged and with a modification by S. Gobelman	Admitted
202	Updated Demonstrative prepared by S. Gobelman	Admitted

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CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were e-mailed and mailed, first class, on July 12, 2016, to each of the persons on the attached service list.

It is hereby certified that a true copy of the foregoing order was hand delivered to the following on July 12, 2016:

John T. Therriault Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Ste. 11-500 Chicago, Illinois 60601

Bradley P. Halloran

Hearing Officer

Illinois Pollution Control Board

100 W. Randolph Street, Suite 11-500

Chicago, Illinois 60601

@ Consents to electronic service

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SERVICE LIST

PCB 2014-003 @ Matthew D. Dougherty Illinois Department of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764

PCB 2014-003 @ Lauren J. Caisman Bryan Cave LLP 161 N. Clark Street Suite 4300 Chicago, IL 60601-3715

PCB 2014-003 @ Evan J. McGinley Office of the Attorney General 69 W. Washington Street, Suite 1800 Chicago, IL 60602 PCB 2014-003 Office of Chief Counsel Illinois Department of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764

PCB 2014-003 @ Susan Brice Bryan Cave LLP 161 N. Clark Street Suite 4300 Chicago, IL 60601-3715

PCB 2014-003 @ Ellen F. O'Laughlin Office of the Attorney General 69 W. Washington Street, Suite 1800 Chicago, IL 60602

EXHIBIT L

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)
JOHNS MANVILLE, a Delaware corporation,)))
Complainant,) PCB No. 14-3
v.)
ILLINOIS DEPARTMENT OF TRANSPORTATION,)))
Respondent.)

AFFIDAVIT OF DR. TATSUJI EBIHARA

- I, Dr. Tatsuji Ebihara, hereby declare and state as follows:
- 1. I am over the age of twenty-one, of sound mind, and am capable of making this declaration.
- 2. I am currently a Senior Technical Leader at AECOM Technical Services ("AECOM"), and I have been the project manager for the Johns Manville Southwestern Sites ("Southwestern Sites") since 2007. In this position, I have been involved in, among many other things, the investigation activities, the engineering evaluation, the costs analysis, the preparation of the Removal Action Work Plan and preparation of the Final Report.
- 3. During my role as Project Manager for the Southwestern Sites, AECOM communicated with the United States Environmental Protection Agency ("USEPA") regarding the work at the Southwestern Sites that USEPA required JM to perform. AECOM created maps, drawings and figures regarding the Southwestern Sites for USEPA's review and approval.

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4. AECOM provided maps, drawings and/or figures to Weaver Consulting Group

for use in creating Autocad drawings. All of these maps, drawings and/or figures provided to

Weaver Consulting Group for this use had been reviewed and approved by USEPA.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil

Procedure, the undersigned certifies that the statements set forth in this instrument are true and

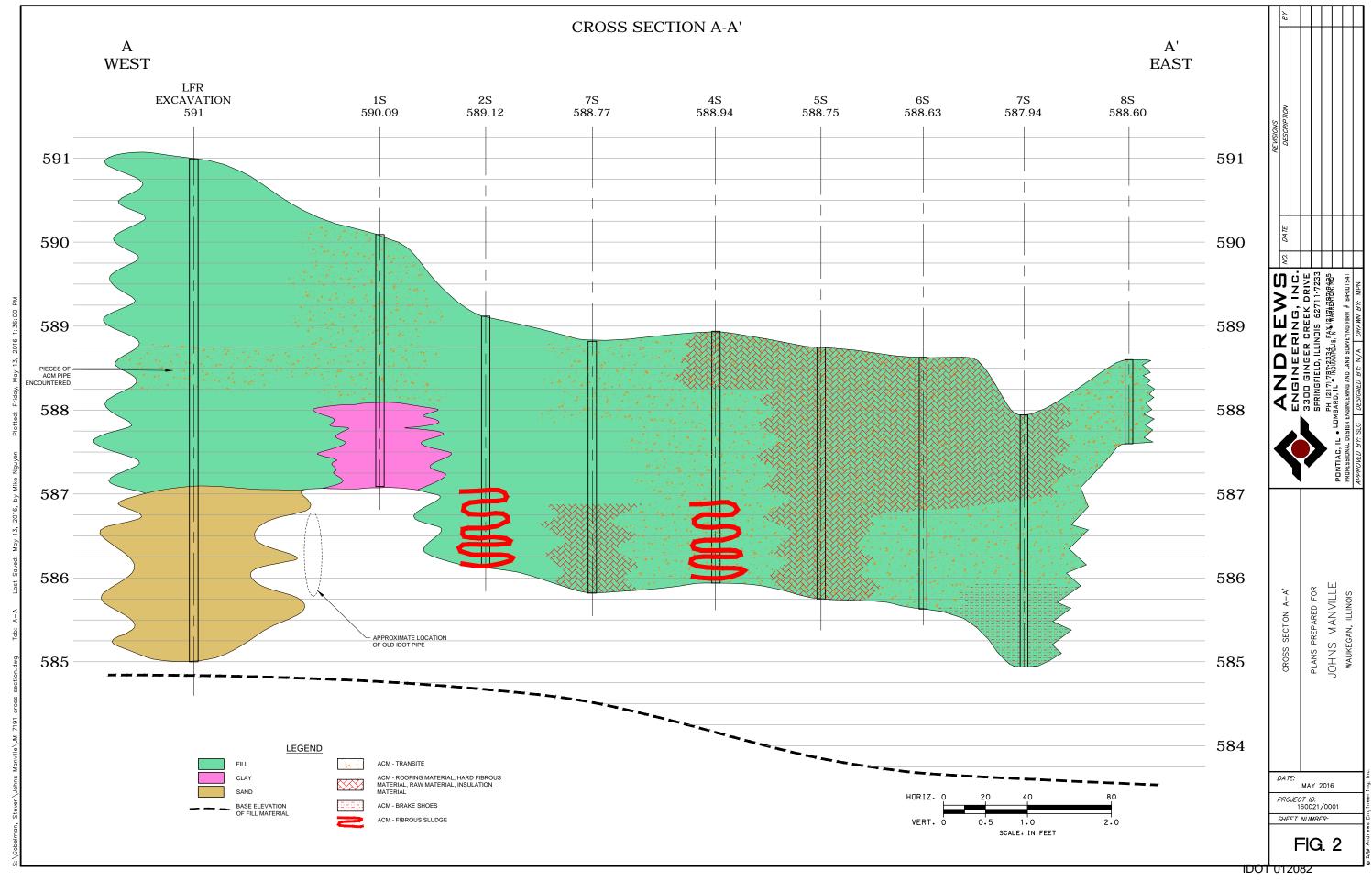
correct, except as to matters therein stated to be on information and belief and as to such matters

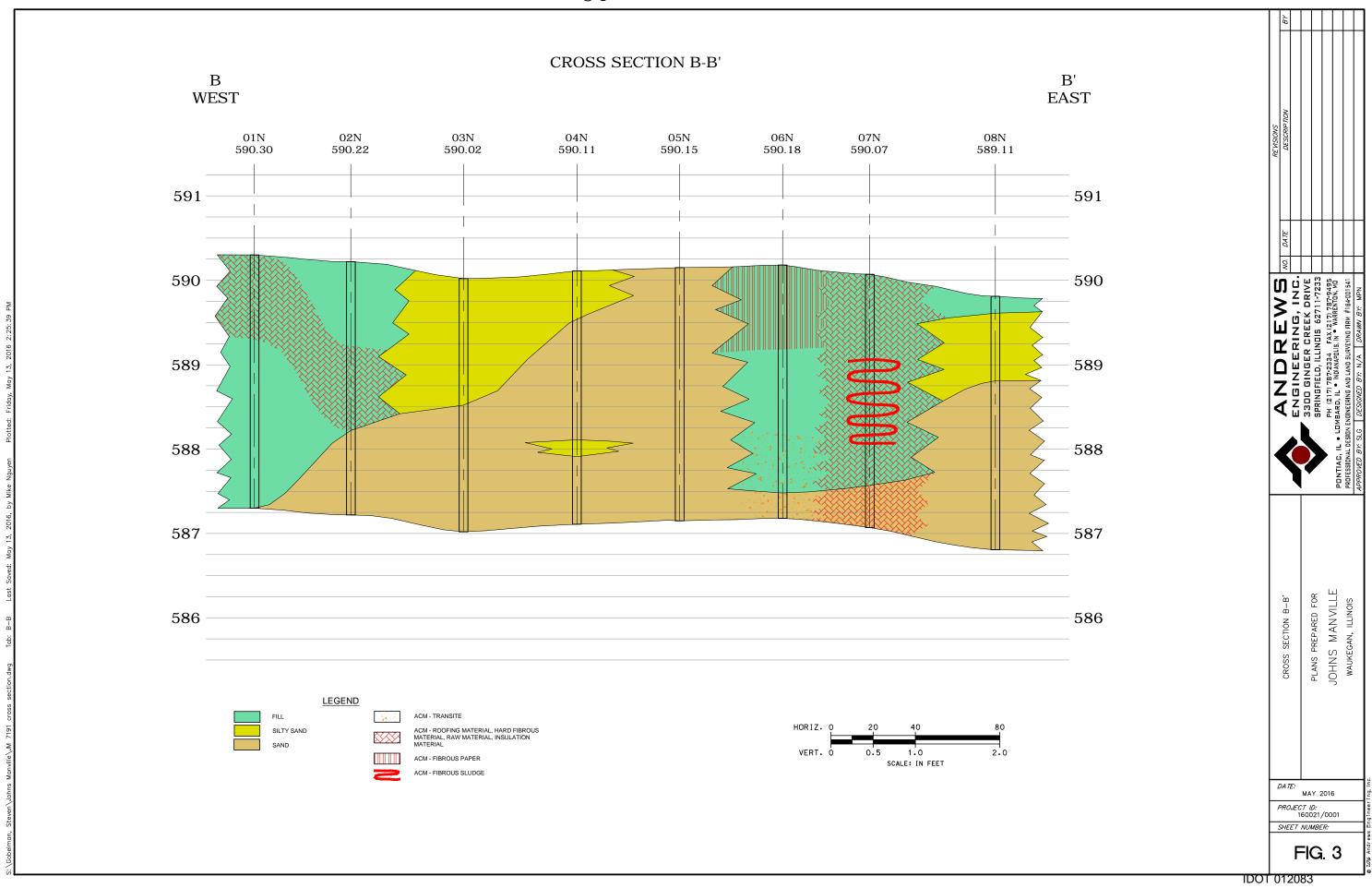
the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: August 27, 2019

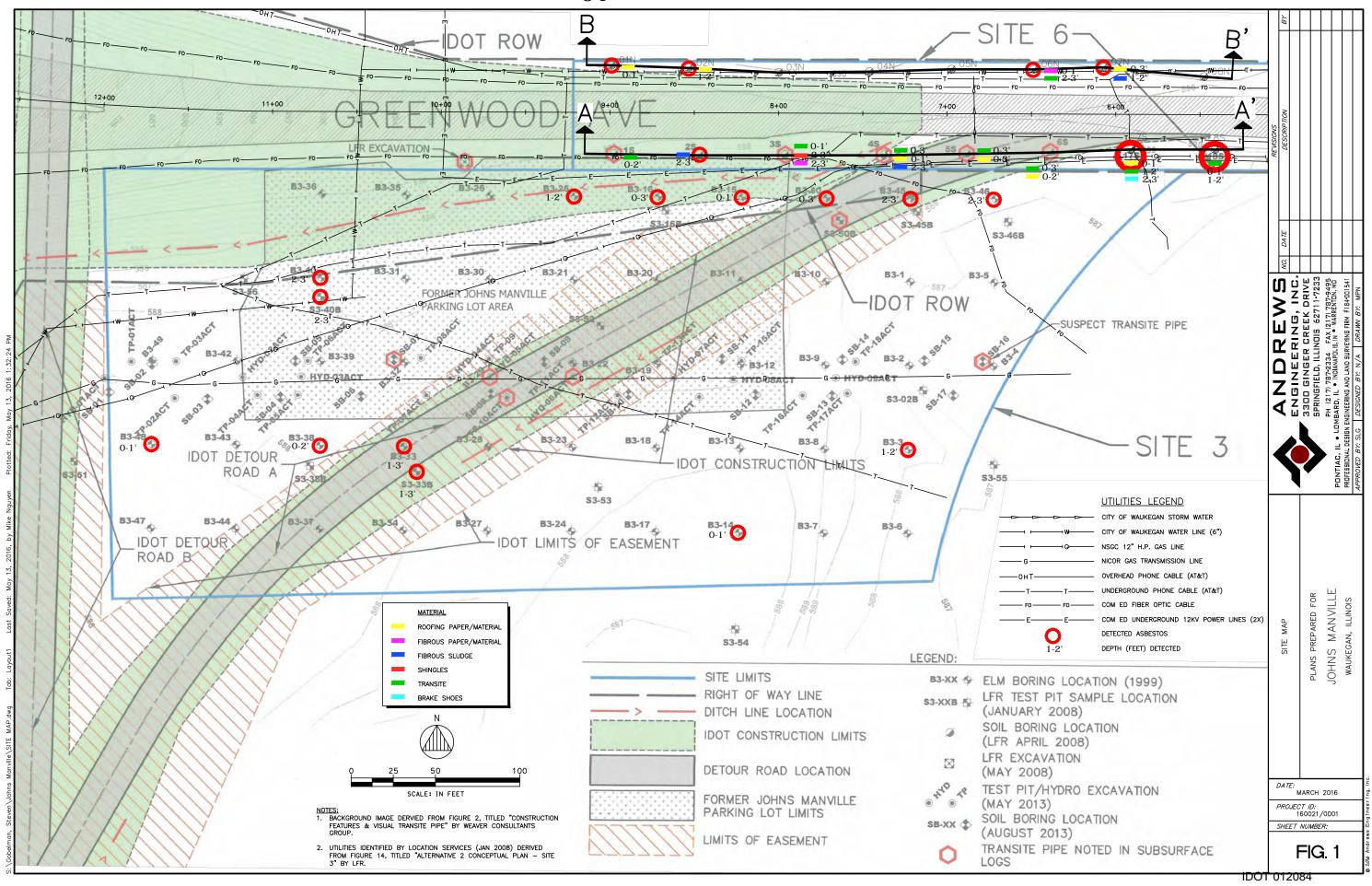
Dr. Tatsuji Ebihara

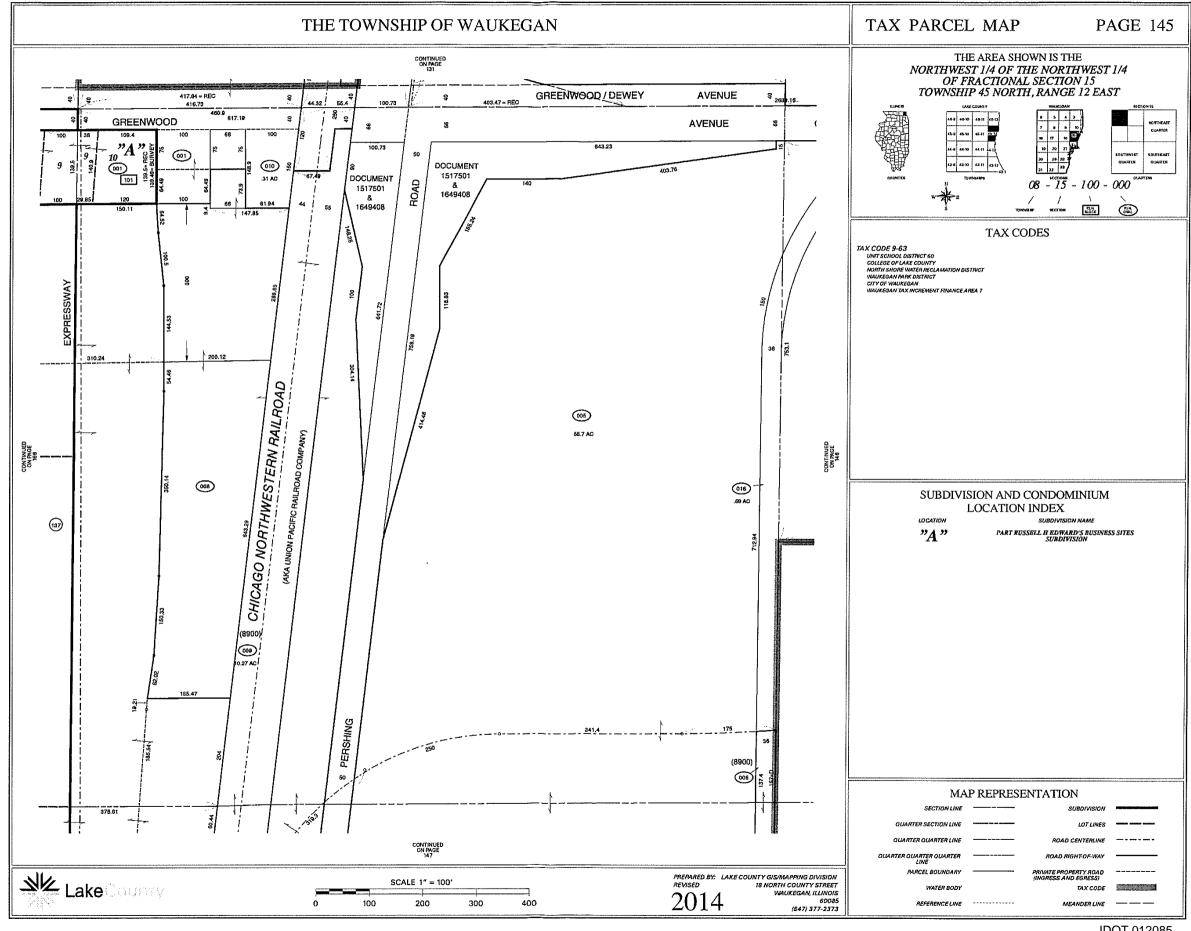
EXHIBIT M



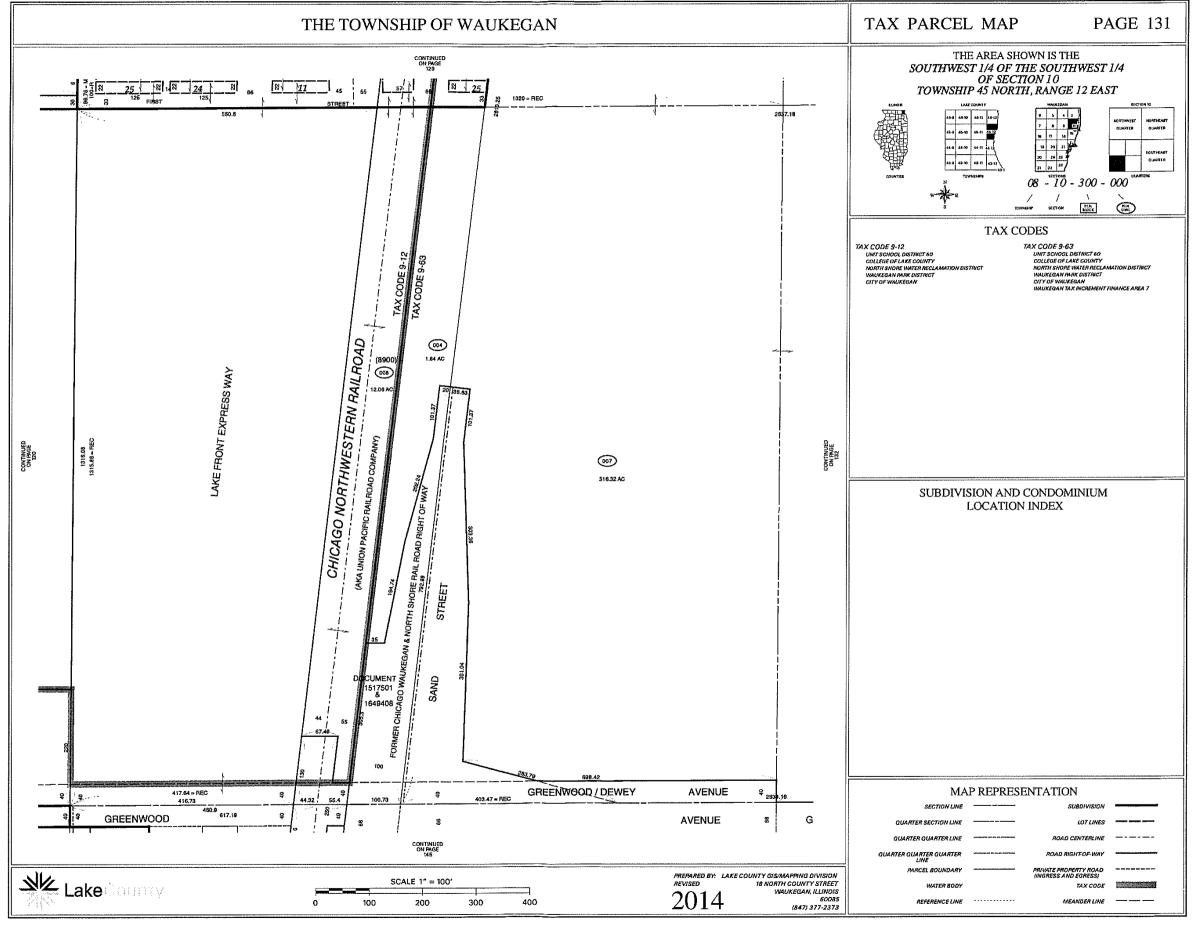


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EXHIBIT N

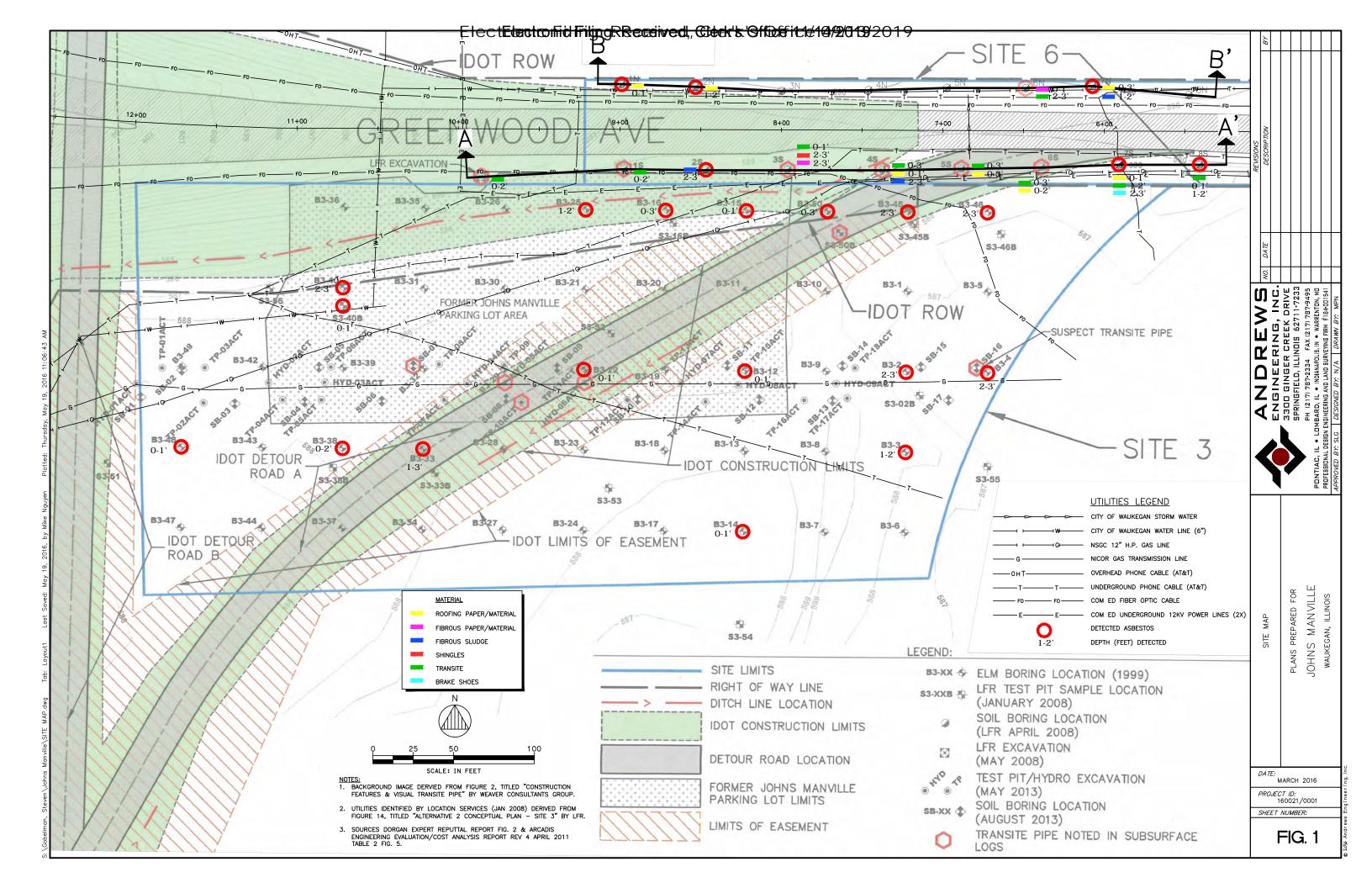


EXHIBIT O

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD 1 I N D E X In The Matter of: 2 WITNESS EXAMINATION JOHNS MANVILLE, a Delaware STEVEN L. GOBELMAN Corporation, Examination By Ms. Brice 4 PCB No. 14-3 Complainant, (Citizen Suit) 6 ILLINOIS DEPARTMENT OF TRANSPORTATION, EXHIBITS NUMBER GOBELMAN EXHIBITS MARKED Respondent. Exhibit No. Exhibit No. Group Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 35 89 99 10 The discovery deposition of ${\bf STEVEN}\ {\bf L}.$ 10 Exhibit No. Exhibit No. 11 GOBELMAN, called by the Complainant for 11 110 12 examination, taken pursuant to Notice, the Exhibit No. 8 Exhibit No. 9 Exhibit No. 10 provisions of the Illinois Code of Civil Exhibit No. 11 Exhibit No. 12 165 Procedure, and the Rules of the Supreme Court of the State of Illinois, before Mary Ann Casale, a 15 16 Certified Shorthand Reporter for the State of 16 Illinois, taken at 161 North Clark Street, 17 17 Suite 4300, Chicago, Illinois, on the 2nd day of 18 October, 2018, at 9:33 a.m. 20 20 21 21 22 casalereporting.com casalereporting.com 312.332.7900 312.332.7900

2

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APPEARANCES .
                BRYAN CAVE LLP
BY: MS. SUSAN E. BRICE
MS. LAUREN J. CAISMAN
161 North Clark Street
                       Suite 4300
                       Chicago, Illinois 60601-3315
tel: 312.602.5000
                       fax: 312.602.5050
susan.brice@bryancave.com
                       lauren.caisman@bryancave.com,
                               on behalf of the Complainant;
                HON. LISA MADIGAN, Illinois Attorney General
                BY: MS. ELLEN O'LANGHLIN, Asst. Attorney Genl.
MR. EVAN J. McGINLEY, Asst. Attorney Genl.
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                ILLINOIS DEPT. OF TRANSPORTATION, OFFICE OF THE CHIEF COUNSEL BY: MR. MATTHEW D. DOUGHERTY
16
17
                       Asst. Chief Counsel
2300 South Dirksen Parkway
18
                       Room 313
                       Springfield, Illinois 62764
tel: 217.785.7524
20
                       matthew.dougherty@illinois.gov,
                               On behalf of the Respondent.
21
22
23
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(Witness sworn.)
                    STEVEN L. GOBELMAN,
    called as a witness herein, having been first duly
     sworn, was examined and testified as follows:
                         EXAMINATION
    BY MS. BRICE:
          Ο.
                Good morning, Mr. Gobelman
          Α.
                Morning.
                Could you please state your name for the
1.0
     record
11
          Α
                Steven Gobelman.
12
                And your current employer?
          Ο.
                Andrews Engineering, Inc.
          Α.
                And where is that located?
                Springfield, Illinois.
16
          ο.
                You have had your deposition taken
17
    before, as we all know, correct?
          A.
                So, rules of the road, please just let
    me finish my question before you answer it. If you
21
     don't understand a question, feel free to ask me to
    restate it, if it's confusing. If you need to take
     a break, feel free to take a break.
                Okay.
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Ο. Have you been deposed since the last

- deposition taken in this case?
- Have you served as an expert in any form
- since you served as an expert in this case?
- MS. BRICE: Okay. I'm going to mark
- for the record Deposition Exhibit 1.
- (Gobelman Exhibit No. 1 marked for
- 10 identification.)
- 11 BY MS. BRICE:
- ο. Mr. Gobelman, do you recognize this
- (Witness peruses document.)
- THE WITNESS: Yes. 15
- BY MS BRICE. 16
- Ο. And what is it? 17
- It's my expert rebuttal report.
- And what are you trying to achieve in
- preparing an expert rebuttal report in this case?
- What is your objective? 21
- The objective is to have opinions on
- whether or not the cost allocation that was done in
- the original report was accurate and appropriate.

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- that you are rebutting today in your expert report,
- Deposition Exhibit 1?
 - Correct. Α.
 - Do you have any dispute as to
- Mr. Dorgan's qualifications to offer the opinions
- contained in his report?
- I didn't look at that. I don't have any
- reason to believe that there's any issues.
- Okay. So just recapping. So I want to
- make sure I understand what you're rebutting.
- You agree with Mr. Dorgan as on the 11
- amount of the costs that were actually incurred; is 12
- that correct?
- I assume that the costs incurred by ${\sf JM}$
- was the cost that was incurred; that they wouldn't
- pay anything more than what was occurred.
- 17 Okay. But I'm just trying to establish
- that you're not disputing that.
 - Α.
- Are you disputing that the costs laid
- out in Mr. Dorgan's report were actually paid? 21
- Α
- Okay. Are you disputing that the costs
- set forth in Mr. Dorgan's report that were incurred

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- Okay. And what opinions do you plan to
- offer on that hearing in this case?
- My opinion is that the allocations that
- were done in Mr. Dorgan's report weren't accurate
- and appropriate for how it was done, and so I
- provided my view of what I considered to be
- accurate and appropriate.
- Okay. Anything else?
- (Witness peruses document.)
- 1.0 THE WITNESS: No. I think that would
- 11 cover it
- BY MS. BRICE: 12
- 1.3 So I just want to make sure I
- understand, and I think -- actually why don't we
- mark Mr. Dorgan's report as Deposition Exhibit 2.
- 16 (Gobelman Exhibit No. 2 marked for
- identification.) 17
- 18 BY MS. BRICE:
- Do you recognize this document,
- 20 Mr Gobelman?
- 21 (Witness peruses document.)
- THE WITNESS: Yes. 22
- 2.3 BY MS. BRICE:
- And is Mr. Dorgan's report the report

and paid were reasonable?

- Α. No.
- And I think you agree, just double
- checking, with his methodology of placing the costs
- into task buckets; is that correct?
 - Say that again.
- I think you agree the with his -- the
- method that he used to put the costs into various
- task buckets; is that correct?
- Α
- 11 0 And you used the same task buckets that
- 12 he utilized?

21

- Α.
- If you can look at the exhibits to
- Mr. Dorgan's report, the -- Let's start with
- 16 Exhibits B. And I'm just trying to nail down here
- what you're disputing and not disputing. 17
- So I take it from what you said that
- you're not -- Well, the résumé is one thing.
- Exhibit B, the AECOM cost tabulation 20
- are disputing? And I will state for the record

correspondence, there is nothing in here that you

- this is not -- this is just putting things into
- task buckets and explaining the narrative

description of the invoice cost to JM. BY MS. BRICE: Correct. I'm not disputing. Ο. You can answer the question. Okay. How about Exhibit C, which is the I know. material from Mr. Peterson concerning the same I dispute that -- that there isn't an issues of costs? accurate map that show these things. And I don't know the basis from which he drew this (Witness peruses document.) THE WITNESS: I'm not disputing those Okav. Other than that. Is there anything that you're disputing about the accuracy BY MS. BRICE: of this document? 10 Okay, great. MR. McGINLEY: Objection; vague and And D, the Manikas invoice table, are 11 11 ambiquous. 12 you disputing this table in any way? 12 (Witness peruses document.) MR. McGINLEY: Susan, just so we're (Witness peruses document.) THE WITNESS: E? clear, you're asking about the accuracy of MR. McGINLEY: D. "this document" being Figure 3, Figure 4 THE WITNESS: No 16 or --16 BY MS. BRICE: MS. BRICE: I said Figure 3 in the 17 And I take it the same answer, as you're question, yeah. not disputing E which are payment records; is that THE WITNESS: Oh, Figure 3 in question correct? 20 onlv? 21 BY MS. BRICE: 21 Α. Correct.

right, the --

Okav. Great.

10

But what you are disputing is Exhibit F,

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12

Well, it's going to -- I'm going to have

I thought you said 3 and 4. That's why

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Α Yes -- the cost allocation attribution Ο. tables? Okav. Q. Perfect. I'm glad we got that all sorted out. Α. We're done. Almost. Other than what's expressly stated in your report, are there any other aspects of 10 Mr. Dorgan's report that you are disputing? 11 Only as it relates to the -- how the 12 Α. 1.3 costs were allocated. Okay. If you can turn to Figures 3 and 4 of Mr. Dorgan's report. 16

(Witness peruses document.)

BY MS. BRICE: 17

18 Ο. Are you there?

A.

20 Are you disputing anything concerning the accuracy concerning Figure 3 in Mr. Dorgan's 21

22 report?

23 MR. McGINLEY: Objection; vague and

ambiguous.

I was --

Oh, I'm sorrv.

Ο.

to ask the same question --

So if you're answering as to both

Figure 3 and 4, that's fine -- I mean, let me try

and short-circuit this.

I think my understanding is you believe

that the location of the northern boundary of

Site 3 is further north, is that correct, than it

is on Mr. Dorgan's, at least Figure 1; is that

10 right?

11 MR. McGINLEY: I'm sorry.

12 Figure 1 now?

MS. BRICE: Well, that's the one that

he talks about all the time in his report.

He doesn't talk about Figure 2 or 3 in his

16 report.

17 THE WITNESS: So you want me to look at

1? I'm confused.

BY MS. BRICE:

Okay. In Figure 1, in Dorgan Figure 1,

my understanding is -- and we'll get into detail on

this -- is that your predominant problem with

Figure 1 is that you believe the northern boundary

of Site 3 is actually located further to the north;

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is that correct? said? Well, my representation of my figures

hadn't -- the boundary of the northern area of

Site 3 is -- I used the fence line that's

associated with it

0 Sure

Α. I didn't represent whether it was

northern -- I didn't compare to determine whether

or not that line was north of that. To me it was a

meaningless -- it's meaningless to the process of

where the line is or isn't as far as whether it's 11

north of there or not.

It's meaningless in the --

I don't think it -- I don't think it

gives -- it doesn't have any function. 15

16 0

I never looked at and compared whether 17

or not his line is accurate or not. I didn't

compare that process.

Ο. Okay. So what are you disputing about 20

Figure 1? 21

Α The main dispute that I have with

Figure 1 and any of the figures that I don't have

there is no information that shows where -- how

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And the source material, how did they

come up with it --

-- just because it's in their system...

Okay. Would that be the same issue with

respect to Figure 3 and Figure 4?

Α.

And no other specific problems with

respect to Figure 3 or Figure 4?

(Witness peruses document.)

THE WITNESS: No. I don't notice 12

anvthing.

11

BY MS. BRICE:

Ο. Okay. Great. Thank you. And we'll get

back to all of that.

All right. So I want to switch topics. 17

What expertise are you relying on in

offering these opinions?

20 Well, my experience in dealing with

21 evaluating costs on highway authority agreements

that I have done dealing with my work with EPA.

Have you ever done a CERCLA cost

evaluation -- pardon me. Let me rephrase that.

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Do you have any experience doing cost

14

those lines were drawn and how it's tied to

anvthing.

ο. Okay. Let's -- I can represent that

this came from AECOM's materials in its original

CAD drawings off of everything.

So if I tell you that, does that resolve

your problem with Figure 1?

Α. No.

1.0

11 Because it doesn't represent what was --

12 in overlying this with the surveys with other

1.3 things in the final report that shows what the GPS

coordinates are. So the corners, they don't

represent -- they don't all match up, so they

16 should all match up if they're all accurate --

17 Ο. Okav.

-- if it's the same -- so -- because 18

it's the same numbers. So when they don't match

20 up, then something's not tied together.

Okay. We'll get to that later. 21

But your problem with Figure 1 is he 22

2.3 doesn't identify the source material within which

he used to create the figure? Is that what you

16

allocations under CERCLA or State law?

Not specifically regarding State

allocation, right. I'd say no.

Do you have any experience in allocating

costs as between two particular parties?

Α. Yes.

In the context of a legal dispute?

In the context of legal documents.

1.0 Okay. I understand that because,

obviously, when you're doing highway authority 11 agreements you're giving people costs. I'm talking

1.3 about the in the context of a legal dispute.

Do you have any experience in allocating

costs to one party with respect to liability is

allocated this much liability versus another party 16

is allocated this much liability? 17

Not in a court setting.

In any other setting?

20 MR. McGINLEY: Objection; asked and

answered.

THE WITNESS: In context with dealing 22

with other legal documents --

24

21

12

17

18

BY MS. BRICE: expertise in dealing with allocations in this Ο. Okay. I'm not talking about highway context? authority agreements. I'm talking about legal It dealt with different types of dispute disputes. resolutions and how to deal with cost allocations When you say court setting, to me that and disputes. means a very specific thing. And maybe not to you. 0 T+ --So I mean in a legal setting. Well, I mean, it talked about cost and Do you have any experience doing that in how you deal with costs and negotiating costs. a legal setting? What were some of the methods that they 10 Α. told you to -- they explained? I don't remember offhand. That was a 11 Ο. Can you tell me what the Gore factors 11 Α. long time ago --12 MR. McGINLEY: Objection; relevance. -- that that occurred. BY MS. BRICE: Okay. And so these were negotiating 0 costs between who? 16 No? 16 It would -- in dealing with -- at that Α. 17 No. Α. Do you have any idea what I'm talking time it was the class dealing with CERCLA issues. about when I say the Gore factors or what that And what year was this? Early '90s I would say. relates to? 20 Α MR. McGINLEY: Objection; relevance. 21 Ο. Okav. 21

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24

THE WITNESS: Not at this particular

20

I don't remember at this point.

Can you explain -- can you give me any

examples of how courts have -- methods that courts

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BY MS. BRICE: Do you have any experience in preparing CAD drawings yourself? Minimal. Okay. Minimal? Minimal. Α. 0. Could you explain that? Well, I have played with CAD on my computer and stuff like that when I'm dealing with 10 simple stuff Don't you generally have to take classes 11 to learn how to use CAD? 12 I don't have a CAD license. 1.3 Q. Do you have any experience in creating surveys? Not creating. 16 17 ο. In your expert report you say: While at IEPA, I attended 18 continuing education seminars. 20 This course provided information on negotiations, negotiating for 21 the government, dispute 22 23 resolution techniques.

What does that have to do with your

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have used to allocate costs among potentially responsible parties? Α. Did you look into this? Have you ever done any presentations or written any articles on past cost allocation analysis similar to what's being done in this case? A. 1.0 Other than what's listed on your CV and 11 your report, do you have any other experience 12 that's relevant to the opinions you're offering her 1.3 today? What did you do to prepare your report? 16 I reviewed Mr. Dorgan's report. I reviewed the information that was provided with 17 what he referenced and stuff that was provided previously on the older reports that were done in the past -- in the last setting. I took his table that he was using to calculate cost, and then 21 looked at the impacts associated with the board rulings and allocated what I thought was a

reasonable approach to assessing the cost.

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Q. Okay. Did you visit the site?

2 A. No.

Did you go look and see if there's

4 actually a fence there?

A. No.

6 Q. Did you discuss with anyone at IDOT or

7 the AG's office with respect to whether or not a

8 fence is located currently at the site?

A. No.

10 Q. Did you interview anyone in preparing

11 your report?

12 A. No.

13 Q. Did you talk to anyone at IEPA or IDOT

14 or USEPA?

15 A. No.

16 Q. Did you keep any notes at all with

17 respect to preparing your report?

18 A. Other than what was provided.

19 Q. And when you say "what was provided,"

20 you're talking about the, sort of, notebook that

21 there's some redactions --

22 A. Right.

23 Q. -- in there?

24 A. Yes.

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little unclear as to how it's working.

2 How are they paying for this work to

3 Andrews Engineering? Is it on an hourly basis? Is

4 there a contingency fee? Is there something

5 different about it?

A. It's just an hourly fee.

Q. And did they pay Andrews Engineering for

8 your testimony in the first hearing and the work

9 that you did at the first part of this hearing?

10 A. I believe at that time I had switched

11 jobs at the hearing.

12 When was the hearing? Was that December

13 of '15.

14 Q. June. The hearing was in June.

15 A. June of --

16 O. You had just switched, I believe.

.7 A. June of '15?

MS. CAISMAN: '16.

19 THE WITNESS: Yes.

20 BY MS. BRICE:

21 Q. And before that you were working for

22 IDOT, correct?

23 A. Prior to that, yes.

Q. And when you were doing the work for

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2.4

22

Q. Have you talked to anyone who was -- who

2 is currently or formerly with the Illinois

3 Pollution Control Board since the last hearing?

4 A. No.

Q. Who is your client in this matter?

A. The Illinois Department of

7 Transportation.

Q. And what are your duties as an expert --

9 MR. McGINLEY: Objection; vague and

10 ambiguous.

11 BY MS. BRICE:

12 Q. -- in this case?

13 A. To provide my opinions on what's

14 provided.

Q. Anything else?

A. No. I think that covers it.

Q. Who's paying for your work?

18 A. The Illinois Department of

19 Transportation

20 Q. And are they paying you or are they

21 paying Andrews Engineering?

22 A. They're paying Andrews Engineering.

23 Q. And can you describe that arrangement

24 with me? I know we have a contract, but I'm a

2 matter, were you getting paid in any way or

3 compensated?

4 MR. McGINLEY: At what point in time?

IDOT at the beginning of the first phase of this

5 MS. BRICE: Prior to leaving IDOT.

6 THE WITNESS: I was only compensated on

7 my salary, based upon nothing more.

8 BY MS. BRICE:

9 Q. Okay. Since IDOT is your client, who

10 ultimately decides what goes into your expert

11 report?

12 A. I do.

13 Q. And who ultimately decides what you say

14 at the hearing in this matter?

15 A. I do.

16 Q. Did you look at any invoices prior to

17 preparing your report?

18 MR. McGINLEY: Objection; vague and

19 ambiguous.

20 BY MS. BRICE:

Q. There were tons of invoices that were

22 produced with respect -- Let me rephrase.

23 IDOT asked for all of the invoices

relating to costs incurred in this case, and we

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provided them. Q. And do you recall when that would have Did you look at any of those invoices? occurred? It would have been probably at the Α.

ο. How many? beginning of -- after looking at Mr. Dorgan's

Α. I did not count the number of pages, but report sometime in that area.

I pretty much scanned through -- went through all Okay. And since that time, December of Ο.

the information that was provided. 2016, did you go back and look at the various EECA

And how many invoices were there? documents at all?

Yeah, because I used some of the Α.

10 Ο. Do you have an estimation? information in putting mine together, I believe. I have no clue. There were lots of Okay. Do you recall -- other than maybe 11 Α. 11

12 some exhibits did you read through all of the EECA them. 12

Did you read them in any detail? documents and the comment on the EECA documents?

Only a few. I don't know if I read completely

15 ο. And why? Why did you pick a few to look 15 through it all. I just re-familiarized myself with

at? 16

Just to see what they contained. 17 So I want to talk a little bit about 17 Α. Ο.

18 Ο. Did you look at any documents from Site 3 first, especially ELM, right.

Campanella? They did some of the work on the EECA, 19

20

21 Α. 21 Ο. Do you recall which ones? Correct.

I don't remember which ones at the time. And how did they sample?

Do you recall whether or not you saw a A lot of it was test pits, and then

Campanella contract? there was -- I believe there was some borings

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Did you look at any photographs of the

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I believe so.

16

20

1.0

12 1.3

16

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18

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21

22 2.3

Α.

Α.

ο.

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Without seeing it -- I mean, I may

28

correct?

I saw pieces of contracts throughout the associated with it, too.

whole thing. I can't remember whether it was an And were these spaced in a particular

actual -- it was a Campanella one or not. way, these test pits and borings?

site work? confuse it with other things, but most of the time

Α. Unfortunately, yes. there was some structure to the sampling

Which ones? methodology. Ο.

I don't know, about 10,000 of them. Ο. Okay. But as you sit here, you don't Α.

You looked at every single photograph? recall what that was? Q. Α. Unfortunately. 1.0 Α. Without looking at it.

11 Ω Okay. What conclusions did you draw 11 If ACM was detected in a boring, how

from looking at the photographs? much of the area around the boring did USEPA assume

I don't know if I actually drew a 1.3 to be contaminated?

Well, typically I think there was a conclusion. I was mainly looking at to see what

types of work was going on in the area in question. number of figures that represented different

Ο. Okay. Are you planning to offer any 16 methodology of determining the extent, but in the

most cases it went to the next cleanest boring. opinions based upon your review of the photographs? Okay. Can you explain that a little bit

Did you read the enforcement action more?

memorandum that was issued in 2012 prior -- between Well, if a boring was -- if a boring is

the hearing date -- I'm sorry, between the interim impacted and the next boring in another direction

is not impacted, then it would be assumed that the order date and today, which was December of 2016?

I believe I looked at it and scanned impacts were -- unless there was some other

information that gave -- corroborated clean or through it again.

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- 1 dirty, that dirt -- the impacts would go all the $\hfill \hfill$
- 2 way to the clean boring.
- 3 Q. All right. And what if the boring next
- 4 to it was not clean?
- 5 A. If the next boring next to it is not
- 6 clean, then -- then it's still a part of -- you
- 7 sort of assume halfway between is an extent, but
- 8 the extent can still continue to the next boring
- 9 until you get to a clean --
- 10 Q. What remediation work did USEPA require
- $\,$ 11 $\,$ with respect to utility corridors on Site 3 and 6 $\,$
- 12 in the EAM?
- 13 A. The final thing was they wanted a clean
- 14 corridor that the utilities would be in.
- 15 O. And did it matter if there was where the
- 16 ACM -- sorry. Scratch that.
- 17 If the ACM was only located on part of
- 18 the utility corridor, what did USEPA require for
- 9 the rest of the corridor?
- 20 A. USEPA assumed that the entire areas were
- $\,$ 21 $\,$ impacted or potentially impacted, so they required
- 22 a clean corridor throughout the entire area.
- Q. And was this true in all instances?
- 24 A. I guess I don't understand what you mean

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O. Right. I'm just trying to understand.

3 Are there other things you looked at

- 4 that -- You said you looked through the invoices
- 5 and you said --
 - A. Right
 - Q. -- a few other things.
- 8 Can you think of anything else that you
- 9 looked at in preparing your report that's not, you
- 10 know, attached to your report or referenced in your
- 11 report?
- 12 A. I try to make a point to look through
- 13 everything that was submitted to me, so there was
- 14 like 40,000 pages of stuff.
- 15 Q. But did you look at everything?
 - A. I believe I did.
- 17 Q. When did you first start working on your
- 18 report?

16

- 9 A. First started working -- actually for
- 20 the report was right after I got Mr. Ergan's (ph.)
- 21 report.
- Q. Okay. But I saw in the invoices there
- 23 was work that was done back in January of 2017.
- 24 What were you doing then?

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32

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- "all instances."
- 2 O. Did USEPA apply that rule to all of the
- 3 utility corridors on 3 and 6, as far as you know?
- 4 A. Yes
- 5 Q. Did you review any depositions in
- preparing your report?
- 7 A. Yes.
- 8 Q. Which ones?
- 9 A. Mr. Dorgan's, Peterson's, Ebihara's, and
- 10 I don't think I ever completed, but I -- most of
- 11 the Campanellas, what, Susan and -- I forget what
- 12 her last name is Zordic (ph.) or Zorgan (ph.) or
- 13 something like that.
- 14 Q. Okay. But not Mr. Manikas?
- 15 A. I think I looked through Manikas. I'm
- not sure -- All of them that I had, so I'm trying
- 17 to put together which ones I had.
- 18 Q. Why didn't you complete the Campanella
- 19 one?
- 20 A. It was mostly a time constraint.
- 21 Q. Are all the documents reviewed listed in
- 22 your bibliography of your report or are there
- 23 others?
- 24 A. The only thing that's listed in my

- 1 A. I was just looking at, based upon the --
 - 2 it was right after the board ruling, just to see
 - 3 what those impacts -- how that -- what that
 - 4 affects
 - 5 Q. Okay. And we can get to this later.
 - 6 But there was a, I think -- I can't remember his
 - 7 name, but there was someone who was doing some CAD
 - 8 work for you on -- listed on those invoices. And I
 - 9 don't believe we have any documents from that
 - 10 person or emails from that person or anything --
 - any figures that he was putting together at that
 - 12 point in time.
 - 13 Did he put together some CAD figures for
 - 14 you?

16

22

- 15 A. He put together CAD figures, yes.
 - O. Okav.
- 17 A. But they became part of the continuing
- 18 working document that was finalized. There was no
- 19 separate drafts or separate issues.
- 20 Q. So in January you began working on CAD $\,$
- 21 figures, January of 2017?
 - A. In a -- Yes.
- Q. And what were you doing in January?
- What were the CAD figures in January 2017?

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Just looking at how the board ruling and how that allies in with the utilities and the

Q. And you don't have any emails that

contain copies of those CAD figures?

I produced all the emails that I had

MS. BRICE: I'd ask maybe we can go

back and make sure there aren't any from

January of 2017 or February of 2017 relating

10 to the person who was working on that.

MR. McGINLEY: That would be Mike 11

Nauvn.

MS. BRICE: Mike Nauvn.

MR. McGINLEY: N-G-U-Y --

15 MS. BRICE: Oh, no. This is a

16 different guy.

MR. McGINLEY: Okav. 17

THE WITNESS: Oh, Ryan Curtis.

BY MS. BRICE:

20 Ο. That guy.

21 Α. That guy, yeah.

ο. Were you emailing with him about this

like you did with Mike Nguyn?

I assume so, but I provided all the

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That was kind of the figure that was worked on. That was dated in April.

Α.

That was the working figure.

Okav

Curtis left, and then Mike Nguyn picked

Okay. So the original figure is the one

that has a little bit of red on it?

Yeah, yeah, yeah, yeah, yeah.

MS. BRICE: Just for purposes of having 12

a clean record, let me see if I can pull this

out.

11

Okay. I don't have a Bates 15

number -- Yes, I do, sorry. It's SG003754. 16

Can we mark as Group Exhibit 3. 17

(Gobelman Group Exhibit No. 3 marked 18

for identification.)

BY MS. BRICE: 20

So if you can turn to SG003754, do you 21 0.

that?

Yeah.

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36

emails that T had

Ο. Did vou delete those emails?

Δ I typically don't delete emails.

ο. Okay. So can we just please -- it's

Ryan Curtis.

Α. Right.

Maybe we can spell his name and maybe we Ο.

can figure that out. Okay.

So that were his CAD drawings -- what

10 did they look like? What were on them?

11 They were similar to what -- the final

representation that I provided in my figures. 12

13 Okay. So let's open up your report and

go to Gobelman 1, which is Gobelman Figure 1. Do you see that?

16 Α. Yes.

Can you tell me how the work Mr. Curtis 17

was doing is different from what I'm looking at 18

here on Gobelman Figure 1?

In fact, I think -- now that I remember, 20

there is a figure that was provided to it as part

of an email that was -- that didn't have the 22

2.3 background. It was just a schematic sketch and it

had some like coloring looking at percentages.

Is this the document you're talking

about --

That's Mr. -- is his name Curtis or

Rvan? I'm sorrv.

Ryan Curtis.

-- (Continuing) Ryan Curtis was working 0.

11

21

I think the Figure 757, which they told

1.0 me that is more representative of --

Okay Great

-- of the figure that we were kind of 12

working off of because at that point the waterline

was below the --

Yeah, but this one's dated June 2018,

and the one I showed you was dated April. So it 16

had to be the earlier one. I'll represent for the 17

record this the earliest figure I could find.

Right. Yeah, yeah. They sort of got 19 blended all together, so it's... 20

Can you tell me how this figure from

April 2015, SG003754, is different from Gobelman 1

24 (Witness peruses document.)

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THE WITNESS: I think the essence of the difference is the boring placements in sort of the alignment of the -- of Site 6 because it was just sort of roughed-in. BY MS. BRICE: Okay. Can you explain both those --Let's break those down. The boring placements, what do you mean by that? The figure was just --10 0. Figure 1 you're saying? 11 Figure 1 was just a PDF of what was previously provided or in the files on how the site was laid out. Okay. And when you say "previously in 15 the files," where did that originate? 16 I think this originated from either the 17 work plan or the final report --Okav. -- because it has the stationing -- the 20 lance alongs -- but the easterns and northerns 21 22 denicted on it

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easterns and northerns?

And where do those come from, those

it lays out. Ο. Okay. And you dispute the boring locations on this final report; is that correct? Without having it overlaid on to mine, yeah, I don't know necessarily if it's similar or different or Ο. Well, I think you talk a lot about that in your report --10 -- right, you know, that the boring locations are -- once you move the site up --11 12 Site 3 boundary up the boring locations necessarily move; isn't that right? A. No? Okav. 15 The distances though between the site 16 boundary and boring location changes? 17 18 Α. If you move the Site 3 border 10 feet 20 north, you're telling me the distance between B345 21 and that boundary is not different? It's the same length? Α. Everything is tied together, so if you

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Well, it's part of the State plane coordinating system that they survey in and they mark, and it represents that particular spot. Okay. So these are State markings; is that right, generally? So it's your testimony that this Figure 1 from April 2018 is -- came from either the final report --1.0 I would suspect it came from the final report since it's showing that the waterline is up 11 by the right of way line where the work plan would 12 have headed 50 feet south of that. 1.3 Got it. Okav. And so what -- you said something about the boring locations being different. What's different about the boring 17 locations? 18 Well, I don't know -- these boring 20 locations and how they're laid out here were just 21 based upon what was showing on the -- the figures that I had provided, and I didn't necessarily after 22 2.3 later realize there wasn't necessarily an accurate depiction of what the site orientation was and how

move the northern boundary up 10 feet, you're also moving the southern boundary up 10 feet. And everything associated within is locked in, so everything moves ten feet. Exactly. That's my point. It's moving from where it's depicted on this figure. Everything would have to move. Α. Right. Ο. Nothing is spatially misrepresented 1.0 then 11 Right. Okay. 12 And you also said something about the 1.3 location of Site 6 and Site 3 and that that was something else that was different. Can you explain that to me? 16 Α. Regarding this figure? 17 This figure, and compared to Gobelman 1. ο. Well, I think the thickness of Site 6 was just -- we just I think used a random thickness, not depicting that -- that -- what thickness between the roadway and the edge of 21 Site 3 were 6s. 22 Can you see, sort of -- I'm going to point to it right here (indicating). It's this

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41

- 1 hatched area right here that is above the gray
- 2 colored-in area.
- 3 A. Site 6 hatched area?
- 4 Q. Yes
- 5 A. Yes
- Q. What is that?
- 7 A. That's just that -- the area at that
- 8 time we were looking at, based upon the board
- rulings, what the potential extent of the area
- 10 defined by the board.
- 11 Q. Okay. So that's what you were trying to
- 12 accomplish in this document was try and identify
- 13 the areas defined by the board?
- 14 A. Um.
- Q. I'm just trying to understand.
- 16 A. Yes. In essence, yeah.
- 17 O. So --
- 18 A. It wasn't necessarily the same
- 19 interpretation that was made in the final thing,
- 20 but it was just a --
- 21 O. Understood.
- 22 And that's where -- what I'd like --
- 23 A. -- graph of issues.
- Q. That's what I'd like to get to, but I'm

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- 1 it was due.
- 2 O. Okay. And prior to that time, had you
- 3 ever shown them any other draft of -- or any
- 4 portion of your working draft, shall I say, in any
- 5 way, shape, or form?
 - A. No
- 7 Q. And how about IDOT, had you ever shown
- 8 IDOT any portion of your working draft in any way,
- 9 shape, or form prior to two to three days I guess
- 10 is your testimony before the draft was completed?
- 11 A. No.
- 12 Q. Did anyone assist you in preparing your
- 13 report other than Mr. Nguyn and Mr. Curtis?
 - 4 7 No
- 15 Q. Did anyone ever give you any comments on
- 16 your report?
 - A. Only grammatical.
- 18 Q. And who was that?
- 19 A. I believe the Attorney General's Office
- 20 gave me grammatical fixes as we were going through
- 21 it, looking at it. And then I believe our admin,
- 22 ^ Lana Johnson, had some grammatical changes.
- 23 Q. Okay. Did anyone at Andrews other than
- the two people that I've mentioned assist in

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44

42

- going to stay on track, and then we'll come back to
- 2 this
- 3 How many drafts of your report did you
- 4 put together?
- 5 A. Just the one that -- the working that
- 6 became final.
- 7 Q. Okay. But there was a working draft
- 8 that, I'm sure, you shared with someone --
- 9 A. It was just a --
- 10 Q. -- at some point in time?
 - A. -- a draft -- the only thing that was
- 12 ever shared in draft form was the version that went
- 13 $\,$ to our admin to final -- put it together.
- 14 Q. Okay. So you never shared a draft with
- 15 the Illinois Attorney General's office?
- 16 A. I never shared a paper draft.
- 17 Q. How about on a WebEx or an electronic
- 18 draft?

11

- 19 A. Only provided them in a meeting before
- 20 it was completed. I showed them on a computer
- 21 personally of what the draft was going to look
- 22 like -- what the final was going to look like.
- Q. And what was that?
- 24 A. It was like two days, three days before

1 preparing your report?

- 2 A. No.
- 3 Q. How did you decide what your opinions
- 4 were going to be?
- 5 A. They were decided based upon reviewing
- 6 the information.
- 7 Q. Okay. Did you ever discuss what your
- 8 opinions might be with the Attorney General's
- 9 Office?
- 10 A. I believe we might have had phone
- 11 conversations that I might have told what my plans
- 12 were.
- 13 Q. Okay. Let's talk about those.
- 14 How many phone conversations?
- 15 A. I don't know, I mean, a lot of it was
- 16 just phone conversations on the status of where
- 17 we're at.
- 18 Q. Right, but I'm talking about your
- 19 opinions.
- 20 A. It might have been two, maybe three, I
- 21 guess. I don't know.
- 22 Q. And how long did those conversations
- 23 last?
- 24 A. Maybe 30 minutes.

Q. Did they ever last longer than that?

- A. I don't know. I didn't track time.
- 3 Q. Actually, you do track time.
- A. Well, I do track time. But, I mean, I
- 5 didn't track time of the actual phone calls. I
- mean...
- 7 Q. Okay. And what did you discuss in those
- 8 phone conversations about your potential opinions?
- 9 A. I believe we discussed my approaches of
- 10 what I was going to do, what I was planning to do.
- 11 Q. Okay. And what did you tell them?
- 12 A. That I was looking at this as a --
- 13 dealing with the cost allocations using percents of
- 14 impacts versus the area.
- 15 Q. And why is that? Why did you decide to
- 16 use percents of impacts?
- 17 A. To me it would seem to be an appropriate
- 18 way of looking at things as far as if there's a
- 19 specific area that the board has ruled that IDOT is
- 20 liable for, then IDOT should only be accounting for
- 21 that area that's impacted within their area.
- Q. And what did Attorney General's Office
- 23 think of this?
- 24 A. I don't think they ever had it. But

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- Q. Can you give me an example, please?
- 2 A. Not -- I don't remember them. I mean, I
- 3 don't know, what we discussed, I mean as far as
- 4 actual questions.
- 5 Q. Well, when did you have this meeting,
- 6 this morning?
- 7 A. No
- 8 Q. When was it?
- A. Yesterday.
- 10 Q. And you don't remember anything --
- 11 A. Well, other than just in general.
- 12 O. -- about the line of question- --
- 13 A. It was a general...
 - Q. Okay. What were some of the general
- 15 topics?
- 16 A. Dealing with what they might ask -- what
- 17 things you might ask regarding the different
- 18 sections of different things.
 - Q. Okay.
- 20 A. It wasn't much of anything.
- 21 Q. Can you give me an example?
- 22 A. That you'll probably ask a lot of
- 23 questions regarding the base map creation.
- Q. Okay. Anything else?

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48

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- they just said, It's fine, whatever you think is
- 2 appropriate.
- 3 Q. And how about -- Did you consider any
- 4 other approaches other than looking, as you
- 5 described it, as percent of impacts?
- 6 A. No. I don't think I came up with any
- 7 other approaches.
- 8 Q. And so why did you -- so you didn't
- 9 $\,\,$ consider any other approach and rule it out is what
- 10 you're saying?
- 11 A. Well, I looked at maybe -- Dorgan had --
- 12 Mr. Dorgan had his approach, and I ruled it out.
- 13 Q. Sure. Understood. But I mean other
- 14 than that.
- 15 A. I don't -- I don't think I had any other
- 16 approaches.
- 17 Q. I imagine you met with the Attorney
- 18 General's Office to prepare for today's deposition;
- 19 is that correct?
- 20 A. Yes
- 21 Q. And what did you talk about,
- 22 specifically?
- 23 A. Just potential line of questioning that
- 24 I might get asked on this.

- 1 A. No.
 - Q. Did you come up here with Mr. Dougherty?
 - 3 Did you guys travel together?
 - 4 A. No.
 - 5 Q. How certain are you of the opinions in
 - 6 your report?
 - A. Very certain.
 - 8 Q. Are you 100 percent certain like you
 - 9 were last time?
 - 10 A. 100 percent certain within a reasonable
 - 11 degree of scientific --
 - 12 Q. Okay. What does that mean?
 - 13 A. I'm pretty confident that my approach is
 - 14 accurate.
 - 15 Q. Okay. So give me a percentage of
 - 16 certainty.
 - 17 A. You want to go 100 percent, I'll go
 - 18 $\,$ 100 percent with you.
 - 19 Q. Okay. So there's no room for doubt that
 - 20 your opinions are incorrect or inaccurate in any
 - 21 wav?
 - 22 A. The approach is correct.
 - 23 Q. But I'm asking about your opinions and
 - 4 all of your opinions. And so the approach is

approach. I'm talking about the all the opinions

this -- I guess you're calling it percent of impact

- in the report.
- Are you 100 percent certain that they're
- accurate?
- Α I'm 100 percent certain that they're
- accurate based upon the information that's in the
- reports that I relied on in coming up with the full
- area of impacts.
- 10 Ο. Okay. What degree of certainty is
- 11 required for experts?
- Within a scientific certainty.
- At Andrews Engineering I recall from the
- last hearing that most of your work is for IDOT.
- 15 Is that still the same?
- A lot of my work is reviewing IDOT but 16
- not all of that. I mean, I have multiple other 17
- private clients.
- Q. Okay. And what percentage of your work
- do you do for IDOT?
- I would suspect it's probably somewhere 21 Α.
- 50 percent, 60 percent, I guess, maybe.
- Okay. And do you get compensated for
- work that comes in from a particular client from

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- Do you consider -- whose client are
- thev?
- I suspect they would be the president's
- client because he was the one that had the
- contracts -- started the contracts with IDOT.
 - But do you believe that your bonus is in
- any way impacted by your work with IDOT?
- No, I don't think so.
 - No. Well, you're going to have more
- hours, right, aren't you, if you're working on IDOT
- 11
- Yeah. But it would be billable hours. 12 Α.
- yes, to IDOT, yes.
 - Anything else? Q.
- That's -- No.
- What was your reaction to the board's 16
- 17 opinion when it was issued?
- Α. Somewhat disappointed.
- Well, other than -- that -- that they
- felt that IDOT shouldn't have been liable. 21
- ο. Anything else?
- Α.
- Ο. Was there anything in the decision that

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52

- Andrews? For example, like in a law firm if you
- bring in a client you get a bigger piece of pie
- than if someone else brought in the client.
- Do you get a portion -- some form of
- compensation for having that relationship with IDOT
- and bringing in that work?
- Α.
- So you're just on a fixed salary? Ο.
- 1.0 ο. Okay. And what's involved in your
- 11 honus?
- 12 I believe it's based upon billability,
- 1.3 being how high a percentage are you billable in --
- in being profitable in your -- in your management
- of projects.
- 16 Okav. So profitable.
- Does it take into account the work that 17
- you brought in and how much that is adding to the 18
- value of the firm?
- 20 Α. I guess -- I don't...
- Do you consider IDOT to be your client 21 Ο.
- at Andrews? 22
- 2.3 Α. No.

stood out to you?

11

17

- I can't say anything stood out more than
- any other thing in the ruling.
- How did you receive the board's December
- 15th order?
- Well, I know it was emailed to me, but I
- might have also looked on the Illinois Pollution
- Control Board website.
- And did you provide any comments to IDOT
- with respect to the board's opinion?
 - Α Nothing written.
- 12 On the phone?
- I believe there was a phone
- conversation, I think, after it occurred.
- Okay. And what were your comments?
- 16 I don't recall off the top of my head what they were. They were just basically what
- was -- what the impacts were, the borings that
- we're being responsible for. We just talked about
- 20
- 21 Do you remember any questions that were
- posed to you by the IDOT attorneys?
- No. I don't remember anv.
 - Do you remember anything specifically

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1 that you told them?
2 A. No.
3 Q. Okay. Let's go back to Exhibit 1,
4 Mr. Dorgan's report.

MR. McGINLEY: It's Exhibit 2 actually.

6 MS. BRICE: I'm so sorry.

Mr. Gobelman's report. I do this all the

8 time. I apologize.

MR. McGINLEY: So do you want his

10 report or Mr. Dorgan's report?

11 MS. BRICE: I want his report.

12 BY MS. BRICE:

13 Q. If you could turn to Section 5.1 of the 14 report, base map creation.

15 A. Mm-hmm.

16 Q. Here you say that you had to create a

17 base map in order to assess costs.

18 Why is that?

19 A. Well, when I looked at the maps that

were in Mr. Dorgan's report, and then my original

21 thought was that we would use the figures that were

22 in the final report that actually gave me northern

23 and easterns points of the corners. And then in

24 Mr. Dorgan's report, he had a survey that was

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submitted to USEPA?

A. Yes, I would assume it did, yes.

Q. What is your point you're trying to make

here in Section 5.1?

A. In essence, the point is that without

6 having a base map that I could depend upon, I

7 created one, in essence, from scratch based upon

the information from various reports because the

9 rest of my dealings was going to be based upon that

base map and I needed to have it as accurate as I

11 thought it could be.

12 Q. Did you go back and look at the AECOM

13 remedial work plan figures and see if they lined

.4 up?

15 A. I believe we looked at a number of

16 figures that over time had been, sort of, overlaid

17 or we tried to use even from the beginning of the

18 hearings in creating our original map based upon

9 Mr. Dorgan's map, and none of it ever lined up to

20 any degree of accuracy. So everything was always

21 skewed one way or another.

2 Q. Is the map that you used in Hearing 1,

the first part of the hearing, is it different from

24 Gobelman 1?

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56

conducted on the site. And I said, Great, that

54

2 would even be better.

But when putting all those -- looking at

4 that, we discovered that none of them lined up;

5 that there was a skewed system in how Site 3 was

looking.

Q. Okay. And who is "we"?

A. Well, Mike Nguyn and CAD was trying --

9 we were trying to figure out together. And he was

10 $\,$ like, None of these -- which one do you want to go

11 with because none of them are the same.

12 Q. Whose idea was it to compare the final

13 report and the Atwell survey?

14 A. Well, I put -- I had -- I didn't because

15 I told him -- I told him to put the -- use the

16 Atwell survey because I figured that was the most

17 accurate and then compare it to what the point in

18 the final report were on the corners of Site 3 and

19 they didn't line up.

21

20 Q. What made you suspicious? Why would you

think that they wouldn't line up?

22 A. Well, it wasn't suspicion. I just

23 wanted to make sure everything was accurate.

Q. Well, hadn't this document been

1 A. Yes, I would say it is, because in the

original one I just took the figures that were in

3 the original map and modified them, not creating

4 anything new but just modifying that original

Dorgan's report's figures.

Q. But as you said here today you cannot

7 tell me if you actually looked at the AECOM Version

8 4 remedial work plan and -- to see if it lined up?

A. Um...

10 O. If it's not --

A. Yeah --

Q. -- on your figure --

13 A. -- it's not on my figure. It wasn't the

one that we used as real using, but it's -- it was

15 probably in our system but just didn't utilize it

16 because it wasn't -- it was the work plan and not

17 the final report.

18 Q. Okay. So you don't know if it lines up

19 or not?

11

12

21

20 A. No, not specifically, right.

Q. If you can turn to Gobelman 1, please.

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22 And I have this handy dandy magnifier because I

 $\,$ 23 $\,$ have a hard time reading it, so let me know if you

24 need it.

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1 So this is the Figure 1 that we have 2 been referring to, correct?

A. Yes.

Q. And it has got a -- it doesn't have a

5 Bates number, but it's dated -- Does it?

MS. CAISMAN: Not in the report.

MS. BRICE: Yeah. It's dated August

8 2018.

BY MS. BRICE:

10 Q. So if you can go over to your notes on

11 the side...

2 A. Mm-hmm.

13 Q. ... actually, on the legend, you say:

14 Approximate Site 3 boundary

15 and approximate right of way.

16 Why do you use the word "approximate"?

17 A. Because the representation of the area

18 defined by Site 3 is based upon the fence line that

was created, and so therefore it's assumed that the

20 fence line is something outside of Site 3, not

21 necessarily representing the actual boundaries of

22 Site 3.

23 Q. Okay. So now I'm really confused

24 because I thought you were -- said earlier that the

casalereporting.com 312.332.7900 1 blue line?

A. I don't know. Without scaling it off, I

3 would say it's probably maybe 5 feet.

Q. Okay. And then below that you've got a

5 red line that says, approximate Site 3 limit Figure

6 Dorgan report.

7 Do you see that?

8 A. Yes

11

Q. And how far is that from the black line,

10 would you say, approximately?

A. Somewhere between 10 and 15 maybe.

12 Q. Okay. And the green line, I think, is

13 coextensive with the red line on that northern

14 boundary, is that correct -- So the same -- because

15 it doesn't show up, but it seems to follow the red

16 line almost everywhere.

17 So I'm trying to see if it's --

18 A. Yeah. I would say on the northern

9 boundary, the green and the red are the same line.

20 Q. Okay. Got it.

21 So which one of these are you saying is

22 the Site 3 boundary?

23 A. What I am saying is that I'm using my

24 fence line drawing of the Site 3 as being the

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fence line was demarcating the boundaries of

2 Site 3.

3 Is that --

A. The fence line is demarcating that

5 somewhere inside that fence line of Site 3, it's --

whether it's accurate that the boundary of Site 3

7 is actually on the fence line, there's no

8 information to say that.

9 Q. Okay.

10 A. I'm just making that as an assumption,

and I'm making it that Site 3 is the fence line.

12 Q. Okay. Let's turn to Exhibit 2 in the

13 same document which is further toward the back, and

14 it's dated August 2018.

Do you see that?

16 A. Mm-hmm.

Q. So then there's -- you have your line,

18 approximate Site 3 boundary as shown on Gobelman

19 Figure 1. Then I have beneath that in blue,

20 approximate Site 3 limit of the Atwell document.

21 Do you see that?

22 A. Yes.

23 Q. And how many feet generally are between

that boundary of the -- at the fence line and the

1 Site 3 that I'm using in my base map.

2 Q. Okay. But you don't know for sure that

3 that is the Site 3 boundary, correct?

4 A. The assumption that I am making is that

5 the fence encompasses Site 3.

6 Q. Encompasses is different from being on

7 the Site 3 boundary, though.

8 A. It can be on the Site 3 boundary. I

9 don't know. There's nothing to say how the fence

10 line was -- was the fence line put on the actual

11 line of Site 3 or not.

12 Q. Okay. So you really don't know?

13 A. (Shaking head.)

14 Q. Have you ever attempted to create a map

15 of your own to delineate features and boundaries

16 when one has already been plotted and approved by

17 USEPA?

A. Could you repeat that?

Q. Yeah

20 Have you ever attempted to create your

21 own map to delineate features and boundaries on a

22 property when USEPA has already approved a map

23 where those features and boundaries have been

24 placed?

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- Α. No.
- Ο. What's the proper methodology for
- creating a base map?
- To accurately depict what's on the site
- or accurately depict what's there.
- T know
- But how do you do it, like physically?
- What are the steps that you do to create a base
- 10 Well, depending on the process of what
- you're looking at, it could be looking at property 11
- boundaries, legal descriptions, if it's a full
- property. If it's not a full property, and it's
- just a portion of a site, then it would have to be
- with going out there and surveying or using some
- GPS to mark boundaries or mark a line or something
- like that, layout. 17
- Are you saying that the board's interim
- order was wrong because it relied upon maps that
- had an incorrect Site 3 boundary?
- MR. McGINLEY: Objection; misstates the 21
- witness's testimony.
- MS. BRICE: It's a question.
- THE WITNESS: No.

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- not a boring is 5 feet off or 10 feet off, it
- doesn't necessarily change -- would have changed
- the board's ruling.
- Okay. But you're saying the evidence
- that they were relying on was not correct, is that
- right, the maps?
- MR. McGINLEY: Objection;
- mischaracterizes the witness's testimony.
- BY MS. BRICE:
- 10 Based upon your opinion in this report,
- 11 your current report, you're saying that the maps
- the board was using to render its opinion were not 12
- If you're utilizing my base map, then
- yes, those maps would -- I would have deemed them
- as being inaccurate. 16
- Okay. How did you create this base map, 17
- and step by step? I'd really like to know, like,
- how did you create it?
- Δ Provided in the report, Appendix D --
- Ο. 21
- D as in dog.
- So as we had discussed, coming up,
- looking at everybody else's lines that didn't

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64

62

- BY MS. BRICE:
- No. You're not saving that it's wrong.
- So the maps that the board used to
- render its decision were correct?
- A. I'm not saying that either.
 - Ο. Okay. So what are you saying?
- What are you asking? Α.
- You know, you're saying that the maps Ο.
- that the board used to render its opinion, you
- 10 disagree with those maps, right?
- 11 At this time I disagree that the maps
- may not be truly representative of the actual ... 12
- 1.3 Ο. So then do you disagree with the board's
- opinion that was based, in part, on those maps?
- Α. No.
- Ο. No.
- 17 How can you reconcile that?
- Because the board's ruling is based upon 18
- the maps as they apply. It's relative but it -- to
- 20 what was provided to them, so --
- Right. But now you're saying those maps 21 Ο.
- are wrong.
- 2.3 Α. I'm saying that those maps necessarily
- didn't represent the actual location, so whether or

- match, I decided to look at -- well, then can I
 - create something that I would at least be
 - comfortable with in allocating costs to.
 - So the first step is that I decided that
 - we would use the Google image that showed the final
 - layout of the site, in that it depicted the fence
 - line, and looking at that fence line as the area
 - depicted in -- for Site 3, with some modifications
 - that had to be done to it.
 - 1.0 ο. Okav
 - 11 And then looking then back into the old
 - 12 reports on how Site 3 was laid out in the
 - 1.3 original -- in some of the original investigations
 - and seeing -- utilizing that base map line, how it -- how does it work with the other, older stuff.
 - Okay. So with the Google image itself, 16 Ο.
 - you just went on to Google and pulled off the 17
 - anvmore?

22

- Yeah. We found that Google had updated
- their system to get a more recent map than what we
- were using prior in the original hearings' maps.
- Q. And then what did you do? Did you give that to your CAD guy? I'm just trying to
- understand like procedurally how this is created?

when we were putting this together, he was pulling

Well, my CAD person found when he was --

- up the new image -- he pulled up a new image when
- he was trying to create this map because that's
- what we normally do on all our maps. We have a
- Google image behind it as the base to show what the
- land surface looked like.
- So he came to me and said, Hey, did you
- know there was a new image which is different from
- the ones we were using before.
- 11 And he showed it to me, what that image
- looked like. And I said, Well, then let's just go
- with -- let's see if we lay out the fence line, how
- that lays into everybody else's lines.
- Where are the Google images that you 15
- 16 were using before?
- Α. The CAD system has access to the Google 17
- imaging, so they can -- when he does these maps he
- pulls up the Google images, Google Earth or
- whatever you want to, you know --
- 21 Ο. Okay. But at one point he was using
- different images?
- He was using an older -- what at that
- time was an older image because it wasn't -- I

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- the Atwell report versus the AECOM final report,
- versus your site boundary based upon the fence
- line, correct?
- You're saying these don't line up?
- Yeah. None of them -- yeah, they --
- So you're saying they're inconsistent?
- - So how can you reconcile creating a base
- map using all of these documents that have inherent
- 11 inconsistencies based upon your opinion with
- respect to their borders? 12
- That's what lead me to create my own
- base map.

16

- 15 I know.
 - But how can you reconcile that?
- Well, I reconciled it with looking at 17
- whether or not when I started looking at the older
- information was it somewhat consistent with the
- information of the older field work that was done.
- But how do you justify using conflicting 21
- 22 documents to build one map?
- Well, I'm not utilizing their depiction
- of Site 3 and building my Site 3.

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68

- don't know if it was a 16 or a 17 image that was in
- the system. That was the most recent.
- Did you produce that image?
- No, I think they were produced -- I
- can't remember if it was produced on the older -- I
- don't know if -- yeah, the maps we used weren't using a Google image behind them, so -- but it was
- in the original map as its base in the CAD system.
- You say on the map here that you used a
- Google image, an IDOT ^ right of way legal 10
- description, a Site 3 location derived from the 11
- AECOM removal action work plan, Revision 2, and 12
- grid and water line locations derived from the 1.3
- AECOM final report, Figure 2.
- Do you see that?
- 16
- Now, let's go back to Exhibit -- the one 17
- where you're comparing the blue and the green and 18
- the red. I think it's Figure -- it's in the
- appendix. You're right. It's Exhibit 2. 20
- Do you see that? 21
- 22
- 2.3 So on this document you're saying that
- the Site 3 boundaries are different, if you look at

- Well, you are. You say that you were
 - using the AECOM document, and you're using the
 - final work plan to build your Site 3. You say it
 - right there in your notes.
 - Α. On Figure 1?
 - ο. Yes.
 - Α. Yes.
 - Right.
 - So how do you justify using conflicting
 - 1.0 documents to create the same map?
 - 11 MR. McGINLEY: Objection. I think that
 - 12 misstates his testimonv.
 - THE WITNESS: It doesn't -- I'm not
 - utilizing in my Figure 1 what they depicted
 - in my Exhibit 2 as being how they were
 - representing. I wasn't utilizing them. 16
 - BY MS. BRICE: 17
 - But you say on Figure 1 you are
 - utilizing them, so we'll just leave it at that.
 - Okay. Let's go to the -- I want to 20
 - 21 go -- Actually, for one second, let's go to the Atwell survey, which is on Dorgan Exhibit 2. I
 - think it's on F. It's at the very end, perhaps the
 - very last document, G. It is G?

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Okay. How did you use the -- Well,

2 first of all, let me go back.

You say in your report that you assume

4 that the Atwell survey is correct, right?

- A. In my original thought process, yes, I
- $\,$ 6 $\,$ would assume that the survey would have been
- 7 accurate.
- 8 Q. Well, you say that in your report
- 9 actually.
- 10 A. Yeah.
- 11 Q. You say that you assume that the Atwell
- 12 survey is correct as to the location of Site 3; is
- 13 that right?
- 14 A. Yes.
- 15 Q. And did you talk to anyone at Atwell to
- 16 understand their sources for the information
- 17 plotted on the survey?
- 18 A. No.
- Okay. And how did you use the Atwell
- 20 survey in Gobelman 1?
- 21 A. Well, it was utilized as -- in lining up
- 22 all the other -- with other things, corroborate
- those locations. It gave me easterns and
- 24 northerns. And then in determining what the actual

casalereporting.com 312.332.7900 Q. So you're disputing the accuracy of the

Atwell survey that you say in your report you

3 assume is correct

A. I assumed going into it that it was

5 correct.

11

6 Q. But you say it in your report --

7 A. That --

Q. -- that you assumed it was correct.

A. -- I assumed it was correct --

10 O. So with --

A. -- until we evaluated it.

12 Q. But it can't be both ways. You say in

13 the report you assumed it was correct and now

14 you're saying it's not correct but you didn't say

15 that in your report.

16 So is it accurate or not accurate, the

17 Atwell survey?

18 A. I'm saying that I assumed it in my first

19 process in dealing with the report -- in coming up

20 with my base map I was giving you my process. I

21 assumed it was accurate. But I believe it doesn't

22 appear accurate in some areas. At least it doesn't

23 line up with the other information.

Q. It doesn't line up with your fence line?

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72

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points were at the corners of Site 3. I was

utilizing the other figure that was in the final

report that gave the corners northern and easterns.

And that's what caused the confusion of -- that

they don't line up.

Q. But when you go to your exhibit isn't it

true that the Atwell survey does not line up with

8 your fence line? It's actually south of your fence

9 line?

10 A. I agree.

11 Q. So which one is right? Is the Atwell

survey right or is your fence line right?

I have no opinion on which one I

14 think -- there was an error in this survey that we

15 couldn't figure out whether it was skewed or

missing that it didn't have the right spacing that

was defined by in the final report that the corners

were -- looked like they were GPS'd in. These are

19 the corners of Site 3 with these northering and

20 these easterns. And they do not match up on the

21 eastern side of this boundary for those corners.

There is a skewed system. And because of that I

23 created the survey -- I didn't create -- I created

my ^ base map using the ^ fence line as the site.

A. It doesn't line up with the final report

2 figure.

11

3 Q. Okay. But it also doesn't line up with

4 your fence line; does --

5 A. It never -- It was never meant to -- my

fence line figure was never meant to match up

7 perfectly with the Atwell survey.

8 Q. Well, of course not, but you were trying

9 to depict -- your fence line is trying to depict

10 Site 3 boundaries, correct?

A. My base line was to create a figure that

12 I could be comfortable with laying out the rest of

the site in, and the best representation that we

have is the physical visual of the fence line.

Q. Okay. So since the Atwell survey is now

16 incorrect -- I'm -- How did you use the Atwell

17 survey at all, or do you not use the Atwell survey

18 in your report in coming up with Gobelman 1?

19 A. I utilized it only in putting together

20 how things looked compared to other figures that

21 were created to try to get them to line up.

22 Q. But look at Gobelman 1. I think you say

23 you used the Atwell survey to put in 0393?

A. I believe it's probably a note that just

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- went along with all the figures. Q. So it's your understanding that that in Ο. Yeah, but that note is in there on your and of itself is a State plane coordinate? report? Α.
- ο. Did you use the Atwell survey to plot
 - 03932 To plot 0393?
 - Ο. And who would have done that?
 - I would assume whoever put the map
 - Ο.
 - Then why do you say that in here? 11 or Peterson or whoever the at the time.
 - I think it lined up with the Atwell but And so there's -- in all four corners. 12 Ο.
 - I originally had done it through the grant of we see those coordinates, correct?
- public highways.
- 15 MR. McGINLEY: Susan, we have been
- 16 going an hour and a half.
- Do you think we can take a 17
- few-minute break?

Α.

10

11

- MS. BRICE: Sure.
- 20 (Brief recess.)
- 21 BY MS. BRICE:
- Okay. So, as I understand it, we were
- just talking about the different boundaries of
- Site 3, and you said you tried to confirm your

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- It's a coordinate of where that point Did it come from the State or did it come from GPS? Α. I assume it was GPS'd in.

 - together; I mean, whether it was, you know, AECOM

 - And below it on the northeast there's
 - this in 2083 -- it's either a comma or a .100.
 - 17 Do you see that?
 - Α.
 - And what is that?
 - That is the coordinate line for -- that
 - 21 northern-ing line for that grid.
 - ο. And where did that come from? Is that
 - the State plane coordinates?
 - Yeah. It's representing that place,

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76

- assumption by looking at Figure 2 of the final
- report, which is I believe in Exhibit D of your
- report. And it's JM0040322.
- Do you have that there?
- - Ο. Okay. So I have a couple questions
- about this.
- You said -- You have been talking about
- the grid coordinates for the four corners.
- 1.0 Where are the grid coordinates for the
- 11 four corners on this document?
- 12 Α. The northern and easterns are arrowed in
- 1.3 on each corner.
- Okay. So that's the 2083127.1 north and
- 122 -- sorry, 1122790.3E, east; is that correct?
- Α. That is the coordinate for the
- northeast --
- Okay. So these are GPS coordinates? 18
- 20 They're State plane coordinates, I
- 21 believe --
- You think that --22
- 2.3 Α. The northern and the easterns, as far

- that area in the State plane survey -- not a survey
- but...
- ο. Okav. And you say that you compared the
- Atwell survey to this survey; is that correct?
 - - And how did you do that?
- We overlaid one on top of the other. Α.
- Manually?
- I believe we took the Atwell survey and
- laid in where Site 3 was and then he just entered
- the coordinates for the corners and then -- and
- 12 looked to see how they lined up to the Atwell.
- 1.3 Okay. So -- But this isn't a manual
- over- -- I'm not fully understanding. Someone is doing this on CAD?
- 16 Α. CAD, ves.
- 17 ο. Okav. So take me through the steps of
- 18 what he did exactly.
- (Witness peruses document.)
- THE WITNESS: Well, I'm not sure which 20
- that final report figure that had the 22

24

21

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way it went. I know we had the figure of --

1 BY MS. BRICE:
2 Q. This one (indicating) --

-- JM0040322?

- A. Yeah.
- _
- 5 A. Right.
- 6 Q. Okay.
- 7 A. So I know we entered into the CAD system
- 8 to see how it laid out in representation of --
- because we already had the figure of Mr. Dorgan's
- 10 in the system.
- 11 Q. Yeah, but I'm not talking about
- 12 Mr. Dorgan.
- 13 A. I know. I know
- 14 Q. I'm talking about the topographic
- 15 survey, the Atwell survey.
- 16 A. And then in looking -- and then we then
- 17 put in because the -- because the northern-ing and
- 18 easterns are there, we put that in there also and
- 19 overlaid it.
- 20 O. Back up.
- 21 You said first that you took this
- 22 document, and I want to know exactly how he did it.
- 23 And we might have to take his deposition because if
- 24 you don't know then -- you know, this is pretty

casalereporting.com 312.332.7900 that?

A. You just call them up and you just lay

- 3 one on top of the other.
 - Q. Okay. And then what did you do next?
- 5 A. We looked at seeing what -- how they
- 6 were -- how they lined up because if they -- they
- 7 had to be tied to the ground somehow. If not, you
- 8 just got spatially things moving around. So tying
- 9 it to the ground of the coordinate system is what
- 10 we sort of tried to tie them into.
- 11 O. Does the Atwell survey have GPS
- 12 coordinates?
 - A. It gives you the --
 - Q. In the four corners, are there GPS
- 15 coordinates on the Atwell survey?
- 16 A. No.
- Is there a more reliable way to
- determine property boundaries than this, sort of,
- manual overlay in CAD?
- 20 MR. McGINLEY: Objection; vaque and
- 21 ambiguous.
- 22 THE WITNESS: Well, if he had the -- I
- mean, in dealing with full properties, you
- 24 have legal descriptions that define the

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80

78

- important.
- 2 How did you overlay this document and
- 3 the Atwell survey document? Do you know?
- 4 A. We had a PDF figure and then put it in.
- 5 Q. What PDF figure?
- 6 A. Well, I think there was PDFs that we
- 7 had -- We took a -- we had the paper, you know, and
- 8 $\,$ so we created a PDF. They got it as a PDF, and so
- 9 cutting it out and then giving it to him to put ${\hbox{\scriptsize --}}$
- 10 overlay to use and scale based upon those
- 11 coordinates.
- 12 Q. Okay. But then how does he overlay that
- on top of the Atwell drawing in CAD?
- 14 A. (No response.)
- 15 Q. Do you know?
- 16 A. I believe we looked at the coordinates
- $17\,$ $\,$ of the layout and saw that they didn't match up to
- 18 that, and we overlaid those lines.
- 19 Q. Yeah, I --
- 20 A. Because it gives the boundaries and how
- 21 it's laid out.
- 22 O. Right.
- 23 But how do you overlay these two
- 24 documents in CAD? What is the methodology in doing

property's boundaries. You can GPS them in

- in taking corners and running a line down,
- determining what they are.
- 4 BY MS. BRICE:
- Okay. Did you do that here? Did you
- 6 go --
- A. No.
- 8 Q. -- actually go out to the site and GPS
- 9 it?

17

- 10 A. No.
- 11 Q. Can you cite me to any source that says
- 12 this is the reliable method of overlaying maps and
- 13 coming up with grid coordinates?
- 14 A. To me it's standard practice with how
- 15 we've done business in any other property.

might explain to me how this works?

- 16 Q. Okay. Is there a book or something that
- 18 A. I have no idea if there is a book on it.
- 19 Q. How did you ensure that the scaling and
- 20 dimensions on the two figures were the same?
- 21 A. We utilized the grade system out there.
- The eastern and northern grit system and sort of
- tried to get them to line up right, get them
- 24 together.

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Q. Right. But that doesn't deal with

2 scale. You've got PDFs, and you've got scales that

3 are different on two different maps.

- 4 So how did you take into account the
- 5 scale? How did you deal with that?
- A. CAD takes care of the scale in the
- 7 system itself. If the map had a scale --
- 8 Q. Understood, but these are two different
- 9 scales off of the PDFs.
- 10 A. It doesn't matter. It's still to scale.
- 11 Q. Okay. So you somehow accounted for
- 12 that?
- 13 A. It accounts for the scale.
- 14 Q. Okay. Where is the northern fence
- 15 boundary on the Atwell survey?
- 16 A. I don't believe it depicts the fence
- 17 line.
- 18 Q. But it does depict the fence line over
- 19 to the right, does it not, chain-link fence with
- 20 ^ barbed wire?
- 21 A. I don't believe that's the fence line of
- 22 the -- that's bounding Site 3. That's the fence
- 23 line that's -- to the adjacent property.
- Q. Oh. So you don't think the fence line

casalereporting.com 312.332.7900 1 A. Well, there are no grid coordinates on
2 his Figure 1.
3 Q. I know, but you say that. I don't.
4 A. I said they don't match up to the grid
5 coordinates of the other surveys.
6 Q. Okay. So how did you figure that out?
7 A. Taking this figure and then scaling it

8 into the other figures and overlaying it.

Q. Okay. And overlaying them.

10 And how did you -- what's your reference

11 point knowing that you're placing this in the right
12 spot? This doesn't have the -- these State plane

12 spot? This doesn't have the -- these State pla

numbers on it; does it?

A. No.

15 Q. So what are you using as your reference

16 point?

17 A. At that time we were utilizing --

18 because this figure is the sort of same figure

19 that's always been in the system, so it's

20 already -- it was already represented in there, so

21 we just pulled it up based upon -- and sort of

22 lined up based upon the locations of the borings

23 and the ^ right of way line that was depicted.

Q. The right of way line?

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84

82

- is shown on this survey? Is that what you're
- 2 saving?
- 3 MR. McGINLEY: Objection; asked and
- 4 answered.
- 5 BY MS. BRICE:
- 6 Q. Okay. Would it be ordinary for a fence
- 7 if there is a chain-link fence for it to be placed
- 8 on the plot of topographic survey?
- 9 A. Yes
- 10 Q. Let's move to -- you also say the
- 11 coordinates of the Atwell survey don't match with
- 12 Mr. Dorgan's Figure 1, Appendix C. Okay. So let's
- 13 just take a quick look at Mr. Dorgan's Figure 1
- 14 from Appendix C.
- 15 And can you explain to me how you came
- 16 to that conclusion?
- 17 (Witness peruses document.)
- 18 THE WITNESS: Okay. So would you
- 19 repeat your question again?
- 20 BY MS. BRICE:
- 21 O. Sure.
- You say the grid coordinates on Dorgan 1
- do not match the Atwell survey. And I want to know
- how you arrived at that conclusion.

2 Q. So the borings on which map and the

3 right of way line on which map?

Yes.

4 (Witness peruses document.)

5 THE WITNESS: Well, we...

6 (Witness peruses document.)

7 THE WITNESS: I don't know if I can

8 explain it --

9 BY MS. BRICE:

11

16

10 Q. That's fine.

A. -- easilv.

12 This figure is -- it was in to assist --

13 Q. Which figure?

A. The Figure 1.

15 Q. Dorgan 1?

A. Dorgan's Figure 1, which was the

17 original layout in his previous reports.

18 When you look at how those points and in

19 laying this in to State plane coordinates in laying

20 in the corners, they didn't line up.

21 Q. But there's no State plane coordinates

22 on this document.

23 A. But it's represented in a position on a 24 map.

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```
What's the reference that you -- Well,
    you would agree you need to have a similar
    reference point in order to compare different
         Α.
               Mm-hmm
         0
               -- right? Okay
               THE COURT REPORTER: Is that a yes?
               THE WITNESS: Yes. Sorry.
    BY MS. BRICE:
               And with respect to comparing the Atwell
10
    to the final report, you used the State plane
11
    coordinates, correct?
12
               So where is the reference point with
    respect to this document? How did you -- there's
15
    no State plane coordinates so where is the
16
    reference point?
17
               Well, we -- when scaling it into the
    system, it doesn't come up to be the same size as
    the other people's -- the other figures. It's a
    different. It lays in differently.
21
               You can't tell me where the reference
```

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How this reference point for this

```
JM0044 -- 4- -- Isn't it JM0040322,
          Q.
 2
     sorry.
                Okay.
          Α.
                Other than the locations of the
     coordinates, is there anything else about this
     figure that you're disputing?
                I don't believe so, anything.
                Okay. In your report -- and we're going
     back to Section 5.1 -- you say that you created a
     map utilizing current existing conditions.
                Why was it important to use current
11
     existing conditions?
12
                MR. McGINLEY: Objection; misstates the
          testimony.
15
                MS. BRICE: Okay. I'll actually read
          it. Let me find it.
16
                     First full paragraph on Page 4:
                Based on the inconsistent
           location of Site 3 I created a
           site map utilizing current
20
21
           existing conditions.
    BY MS. BRICE:
                Do you see that?
                Yes.
```

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88

86

figure? 0. No. There is no reference point to it. So therefore there's no reference point with respect to the comparing it to the other two figures, so you're not really -- Okay. Got it. Okay. Let's go back to your report. Exhibit 1. I think I'm looking for the Appendix C. Right. And I'm looking for Exhibit 1 on Appendix C 10 on your report. 11 Α Okav. 12 And this is the document that you are 1.3 relying on to say that the four corners do not match up, correct? A. Correct. Ο. Okav. 17 Α. Well, that the sites aren't consistent, 18 laid out. And then let's go back here -- Sorry. 20 There's a lot of documents. 21 Go back to Appendix D. And this is the final report figure that 22 23 you used, the JM004022? Which figure?

Okay. Why? Why use current existing conditions? Δ I used the current conditions meaning that the area -- 2018 aerial showing the fence line as the starting point for the base. Why? I mean, how is that relevant to the location of ACM from ELM in 1999, the current existing conditions? Well, in utilizing that base as a 10 starting point, then I went to compare the ELM map 11 to the base that is created from the fence line and 12 found that the dimensions were pretty close to the 1.3 dimensions that they measured off on the western edge and southern edge of Site 3. Okay. But that's not my question. 16 My question is: How are the current existing conditions relevant to the location of ACM 17 "The current conditions," meaning the fence line, is relative -- that that is the perceived area containing Site 3. 21 How are the current conditions relevant 22 to the work that was done in 2016 and 2017? That the fence line contains -- it is

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- bounded by the work that was done for Site 3. All right. Let's go to the Google map.
- MS. BRICE: And we're going to mark
- this as the next exhibit.
- (Gobelman Exhibit No. 4 marked for
- identification)
- BY MS. BRICE:
- All right. This document was given to
- us yesterday by counsel.
- 10 Is this the Google map that you used for
- purposes of preparing Gobelman 1? 11
- I believe it is, yes.
- Okay. And where are -- Where's the
- reference point on this map for purposes of
- 15 comparing it to the other maps?
- There is no comparisons made on this 16
- map. It's the Google image. 17
- 18
- But how is -- So, don't you, on Exhibit
- 2 in Appendix C compare your fence line to the
- Google image? 21
- 22 MR. McGINLEY: Excuse me.
- You're talking about
- Mr. Gobelman's report?

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- Q. Okay. But it's not on this image?
- 2 Α. No. it's just an image of Google Earth
- of that area.
- But what's the reference point that you
- used here?

12

- In Exhibit 1 -- or 2, I mean? Α.
- In Exhibit 2, what's the reference point
- you used to compare those four different lines?
- 10 The reference point was the layout, the
- overlay of those individual figures --11
 - Right. Ο.
- But that's --
- -- to each other.
- But that's not the reference point that 15
- you have to start from. 16
- 17 You said you have to start from the same
- reference point.
- You have to have it reference some way.
- 20 Okay. And how did you do that?
- 21 Well, the other figures, two of the
- figures have the northern and easterns that lined
- Q. But this doesn't, right?

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92

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- MS. BRICE: Correct. Mr. Gobelman's
- report, Exhibit 2, Appendix C.
- MR. McGINLEY: Can we have a second so
- he can pull it up?
- MS. BRICE: Of course.
- (Witness peruses document.)
- THE WITNESS: Regarding Exhibit 2?
- BY MS. BRICE:
- 10 Α. Okay. What --
- 11 Ω So you're comparing on this Exhibit 2
- the different site boundaries, correct? 12
- 1.3 Α. On Exhibit 2, ves.
- Okay. And the site boundary for the --
- that you were using for the fence line is coming
- 16 off the Google image, correct?
- 17 Correct.
- And so what's the reference point here 18
- to be able to compare those lines off the Google
- 20 image because there's no State plane numbers on
- this Google image; are there? 21
- Not listed. Α. 22
- 23 Ο. Okav.
- It's embedded into the system.

- Which one?
 - The Google image. Ο.
 - It's not showing. It's embedded.
 - You mention in your report that the
 - fence line -- or you can see it here on Gobelman
 - Exhibit 2 from the appendix. The fence line on the
 - northeast and the northwest area are not -- you
 - know, are, sort of, cut off or actually come in,
 - correct?
 - 1.0 Α. (No response.)
 - 11 How would you explain that to me? How
 - 12 did you interpret this northern fence line boundary
 - 1.3 given the fact that it is not consistent across the
 - northern boundary. The fence is not aligned with
 - the point -- I'm sorry. That his was a terrible
 - 16 question.

21

- Let's look at Exhibit 2. Your fence 17
- line is -- take the northwest corner, right? Your
- fence line is up to the north but then the actual
- fence is below the red line, correct?
 - Correct.
- Okay. So how did you come about
- figuring that was the northwest corner proper --
- Α. The --

- 1 Q. -- the fence line?
- A. The fence line in the northwest corner
- 3 dropped below the -- down the slope of the
- 4 embankment. But the figures and everything else
- 5 shows that Site 3 actually is a 90-degree corner.
- 6 So all I did was extend the northern line and
- 7 western line so that they meet to encompass what
- 8 Site 3 has been defined as.
- 9 Q. So it seems like from your earlier
- 10 testimony -- and tell me if I'm right -- that you
- 11 believe that the northern boundary of Site 3 is
- 12 between 10 and 15 feet north of where it was
- 13 plotted by the final report and Mr. Dorgan; is that
- 14 correct?
- 15 A. The area that I am -- The fence line is
- 16 10 to 15 feet north of their lines, yes.
- 17 O. Right, but the fence line is what you
- 18 are using in your report as the Site 3 boundary,
- 9 correct?
- 20 A. Correct.
- 21 Q. Is a Google image a source reasonably
- 22 relied upon by experts in the surveying field to
- 23 map a definitive property boundary?
- 24 A. I don't know, but I would say it's

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- variation in topography in your mapping and
- 2 plotting?

11

- 3 A. I didn't.
 - Q. Okay. So we're going to go back to
- 5 Gobelman 1. And I'm still slightly confused as to
- 6 how you put in Parcel 0393 on here. But let me ask
- 7 you one question.
- 8 You teed it off of this base map; isn't
- 9 that correct? So when you plotted 0393, you used
- 10 Gobelman 1 as the base source?
 - A. I utilized the highway -- the grant for
- 12 public highway legal description and figure --
- 13 Q. Understood
 - A. -- to lay out that.
- 15 Q. And I get that. And we can get to that.
- 16 But you plotted it on Gobelman 1, right?
- 17 So the base that you were plotting it on was based
- 18 on Gobelman 1 which uses the northern boundary as
- 19 the fence line; is that correct?
- 20 A. Yes, I plotted it on Figure 1, yes.
- 21 Q. Okay. Why did you use the legal
- 22 description?
- 23 A. On the basis that I thought it would be
- 24 the most accurate way depicting what the boundaries

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96

94

- probably not definitive without other information.
- 2 O. Do you know what angle this Google image
- 3 was taken from?
- 4 MR. McGINLEY: Objection; vague and
- 5 ambiguous.
- 6 THE WITNESS: No.
- 7 BY MS. BRICE:
- 8 Q. Do you know what height?
- 9 A. No.
- 10 Q. Do you know at what degree of -- I'm
- 11 going to say zoom, but I don't know if that's the
- 12 right word, what degree of focus --
- 13 A. No
- 14 Q. How did you come up with the scaling on
- 15 this document?
- 16 A. Scaling is based on the CAD document.
- 17 It's based on the -- the Google image also has a
- 18 scaling aspect.
- 19 Q. Okay. Is Site 3 completely flat?
- 20 A. It wasn't before. I wasn't out there.
- 21 Q. Google image doesn't take into account
- 22 varying elevations; does it?
- 23 A. No
- Q. So how did you account for this

1 were to make sure it lined up right.

- Q. Are you an expert in legal descriptions?
- 3 MR. McGINLEY: Objection; vague and
- 4 ambiguous.
- 5 BY MS. BRICE:
 - Q. Are you an expert in reviewing legal
- descriptions and plotting the location of property
- 8 boundaries based upon legal descriptions?
- 9 MR. McGINLEY: Objection; compound.
- THE WITNESS: I wouldn't -- not
- necessarily say I'm an expert, but I have
- done it.
- 13 BY MS. BRICE:
- 14 Q. Just walk me quickly through the steps
- 15 that you used based upon the legal description,
- 16 what you did here.
- 17 A. Well, I mean, there was a known from the
- 18 original 70 plan sheets that Station 7 was the
- 19 eastern edge of the right of way. And then looking
- $20\,$ $\,$ back at the -- and then going back to the point at
- 21 the beginning from the legal description what was 22 at the intersection of Sands (ph.) or whatever it's
- 23 called now and Greenwood, from that point measuring
- 24 it off.

1 Q. How? With what?

- 2 A. In CAD. It's distance and bearing.
- 3 Q. Okay. And then you said you also used
- 4 the as-built drawings.
- Why?
- 6 A. Because they lined up -- gave me a
- 7 functionality of where -- dealing with Station 7
- 8 and how it lays out because it sort of ties in
- other things.
- 10 Q. Did you check whether your conclusion
- 11 that Station 7 along Greenwood is at the eastern $\,$
- 12 edge of 0393 with the Atwell survey?
- 13 A. The final depiction was compared to the
- 14 other depictions that we had of 0393 and it seemed
- 15 consistent to what the other ones showed.
- 16 Q. But you didn't check with the Atwell
- 17 survey?
- 18 A. I can't specifically say what I checked
- 19 it with, which specific documents.
- 20 Q. So where you plot the borings is pretty
- 21 important to your opinion, right?
- 22 A. I -- It's important, yes.
- Q. And you say that the borings from
- 24 Gobelman 1 came from ELM15, which is JM00565 in

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- we just talked about to plot your borings?
- A. It was the best map that I could find
- 3 that had the locations of those borings.
- 4 MS. BRICE: Could you please mark that
- 5 document.
- 6 (Gobelman Exhibit No. 5 marked for
- 7 identification.)
- 8 BY MS. BRICE:
- 9 Q. So I'm handing you what's Exhibit 66-57
- 10 from the first hearing, JM004711, which is a
- 11 depiction of the borings on Site 3; is it not?
- 12 A. Yes
- .3 Q. And this is not a draft; is it?
- A. It doesn't say draft.
- 15 Q. Okay. Why didn't you use this document
- 16 as opposed to ELM15 to plot the borings on
- 17 Gobelman 1?
- 18 (Witness peruses document.)
- 19 THE WITNESS: I believe that my
- 20 assumption was these were the same as what
- 21 was in the draft.
- 22 BY MS. BRICE:
- 23 Q. Oh
- Have you checked that?

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98

- Appendix D of your report, correct?
- 2 A. Yes
- Q. This is a draft document, correct?
- 4 A. Um
- 5 Q. It says draft --
 - A. Yeah.
- 7 does it not?
- 8 A. Yes.
- 9 Q. And it also says approximate boring
- 10 locations down there on the left; does it not?
- 11 A. Yes
- 12 Q. And you say in your report that this
- 13 $\,$ figure contradicts your base map as to the length
- 14 of the western and southern boundaries, right?
- 15 A. Yeah. It's not exact, yes.
- 16 Q. So why did you use this for the Site 3
- 17 borings?
- 18 A. Well, I -- I would assume that my
- 19 boundaries would be a little bit larger than --
- 20 than what was depicted because I'm using a fence
- 21 line and not the actual site.
- 22 Q. I'm sorry. I don't think that answered
- 23 the question.
- 24 Why did you use ELM15, given everything

100

- A. I can't remember when I checked it.
- 2 Q. You did check it? You actually checked
- 3 it?
- 4 A. I don't remember.
- 5 Q. So going back to AMM15, how did you
- 6 actually plot these borings on to your base map?
- 7 A. I measured -- scaled off of the ELM --
- 8 the one that's in my report, making the assumption
- 9 that the eastern -- western edge of Site 3 is the
- 10 same as their western edge.
- 11 Q. So you actually -- did you do this in
- 12 CAD or was this an overlay?
- 13 A. It was -- The markings were done in CAD
- 14 based upon a dimension that I provided him.
- 15 Q. But did you actually snap distances or
- 16 did you do something different?
- 17 A. We, I guess, snapped distances based
- 18 $\,$ upon distance from the western edge to that spot
- 19 and from the north down.
- 20 Q. You say that the distance between the
- 21 northern site boundary of Site 3 and B345, so we're
- 22 going -- you say this on ELM is 19.7 feet?
- 23 A. Yes
 - Q. And you -- how did you measure that snap

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103 distance? western edge of Site 6 is 419 feet. Based upon what map? Α. I measured it based on scale. Based upon this figure. So not snap distance? But this figure goes to -- oh, that is Α Correct. They measured, and then they 1S. Sorry. I can't see. placed it on the report based upon --Okav. And you placed the northeast But you didn't do it yourself? Somebody Ο. excavation I think, I believe, somewhat on this else did it? document; is that correct? Α. The measurements? 10 Ο. 10 The location of the northeast excavation, is that based off this document? 11 Α. T measured. 11 You measured it. Okay. 12 Α. Yes. So you used a scale or you used a snap Okay. Do you know whether this document distance or what did you do? What -actually depicts what was done in 2016 and '17 at the northeast excavation, the area that was 15 Α I used a scale. 0 A scale like one of these -actually disturbed? 16 16 I don't know if it exactly did. It Well, an engineer scale. And based upon 17 17 the actual scale that's on the map, you can seemed to line up to what the other reports had. calculate distances. You say you that plotted the Nicor, Okay. And then did you go to Gobelman 1 North Shore Gas, and the water line based on the 20 and plot that distance from the northern boundary final report; is that correct? 21 21 as depicted on Gobelman 1, 19.7 feet down? Is that Δ Yes How did you account for the fact that Yes. Then CAD -- went down and marked the final report coordinates were different from casalereporting.com casalereporting.com 312.332.7900 312.332.7900

102 the location that I gave him. And that was 19.7 feet, correct? Ο. Whatever was stated in the report. ο. Okay. You say that B345 falls three feet outside of 0393. Which map is that based off of? Based --Α. Is that off of Gobelman 1? Ο. Α. 1.0 0. Okay. Okay. If you go to your Exhibit -- Appendix D, and we've got I think 11 it's -- I don't have the right -- actually -- I'm 12 looking at JM004753. Is this -- and I think this 1.3 is Exhibit 6699. Yes, it is. And this is the document you say you used to measure 1F through 9F; is that right? 16 A. 17 Okay. And how were those samples taken? 18 I believe a majority of them were test 20 You say the distance from 1F to 9F is 0. 21 419 feet. 22

104 your map? I didn't necessarily account for it. I mean it lays in there what the -- from all the other utility lines that we just laid in that utility line. Right. But your map is 10 to 15 feet further north than the final report, the northern boundary, correct? If you look at either -- whatever 1.0 Exhibit D the 40322, which is the utilities corridors --11 12 O. Mm-hmm. 1.3 -- it shows that the -- the Nicor Gas runs east/west across the site lies just about slightly north of but within their boundaries of northern-ing 2083000. And if you look at my base 16 map, that is exactly where it lies also, it lies at 17 northern 2083000. Where is that on your base map? I'm not seeing the number. 21 My base map, Figure 1, does not have the utilities marked. Okay. So -- all right. Let me ask this question.

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It's the distance between 9S and the

How did you calculate this?

2.3

just say it's 10 to 15 feet further north of the

Since you said earlier that -- Let's

And you said that that moved everything

up, right --

Α

Ο. -- earlier?

Α. I said if it was moved up, everything

would move up --

10

11

That would --

А. -- together, right.

-- include the location of the

utilities, right? They would be moving up 10 to 15

15 feet from where they were on Mr. Dorgan's map; is

that correct? 16

Α. 17

What were USEPA's reasons for selecting

the remedy that it chose?

20 To make sure that any future work on the

utilities would have a clean portal to work in 21

without having to worry about work and safety

issues with dealing potential asbestos within the

corridor of the utility.

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BY MS BRICE.

At the time of the EAM?

I was trying to think. 9 only went down

a foot, and I can't remember if it had something or

not. But I think most of the east was relatively

clean

11

At that point in time or always?

Well, I'd have to look at the figures. I

can't remember. I only looked at -- I was only

dealing with Site 6 as it relates to IDOT.

Okay. What is your method for defining

the areas of liability? 12

MR. McGINLEY: Objection; vague and

ambiguous.

15 THE WITNESS: The areas of liability

16 were based upon the board's ruling of which

borings IDOT was responsible for.

BY MS. BRICE:

Okay. But when you say "boring," are

you talking about just asbestos directly beneath

that boring or what are you talking about? 21

That boring and how it -- how it's

represented to the rest of the borings around it.

Meaning what? Can you expand on that,

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Ω Okay. Anything else?

To make sure that site was properly

capped so that they wouldn't have any issues from

wind blown and other issues like that.

Did visible ACM play a role?

Α. I believe all ACM played a role.

And how -- How so -- Well, you know, let Ο.

me ask a different question.

Do you dispute that at the time of the

enforcement action memorandum no ACM had been found 10

east of 8S, yet EPA required an entire North Shore

12 Gas clean corridor?

1.3 THE COURT REPORTER: I'm sorry. The

EPA required?

MS. BRICE: Sorry, bad question.

BY MS. BRICE: 16

In the EAM do you dispute that at the 17

time of the EAM, no ACM had been found east of 8S? 18

MR. McGINLEY: Objection. The document

20 speaks for itself.

THE WITNESS: I believe that -- Well. 21

I'd have to look at the map to make sure. I 22

2.3 thought there was something east of 8S.

24

11

108

please?

106

Well, A, it's defined within the right

of way so we don't go outside the right of way on

Site 3. And then if -- if you -- if the -- the

limits would be based upon how -- if you would

looked at, the limit would be a dirty boring going

to a clean boring that you would take the level all

the way to that clean boring. If, like, in Site 6

you have -- you don't have that scenario where the

boring that you're liable for, the next boring to

the east is also contaminated, then my assumption

12 was that you went halfway between those two

borings.

21

And what about depth? I mean, how did

that factor into anything?

16 Α. Depth didn't factor in because it was

whatever was remediated. 17

Right. But sometimes it varied, right?

Sometimes you to dig down five feet; sometimes you

had to dig down two feet.

How did that impact your analysis?

It didn't impact the analysis. There is 22

a potential that you've excavated areas and

pavement in twice in certain areas because

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- utilities and other excavations went through. And
- I chose to assume that the excavated costs, even if
- they were duplicative, didn't get into that rabbit
- hole, so to speak.
- Okay. So you didn't look at volume
- because you assumed we were duplicating costs?
- No. I didn't look at -- I didn't look
- at -- I just looked at the area in which things
- which things were excavated, not the areas that
- were technically -- appeared to be excavated
- multiple times, although probably weren't. 11
- Right.
- But do you have -- as you sit here, do
- you have any reason to dispute that there was
- double counting on the part of Mr. Dorgan for
- excavation in one area versus another?
- I think it's a mechanism of how the 17
- allocations were made in putting them into their
- buckets.
- Right. 20
- 21 But do you have any evidence that there
- 22 was any double counting --
- -- by Mr. Dorgan?

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an unpermitted waste disposal

- operation, and illegally
- disposing of waste.
- - Is that referring to Parcel 0393?
- It doesn't specifically state that.
- Okay. I'll represent for the record
- that it is referring to Parcel 0393, okay?
- 10 Assuming it is relating to 0393, what is
- 11 the board saying here?
- MR. McGINLEY: Objection; calls for 12
- speculation.
- BY MS. BRICE:
 - To the extent you understand.
- That the board believed that IDOT placed 16
- asbestos material as part of their fill material in
- the reconstruction of Greenwood Avenue.
- It's not saying that IDOT is liable for
- waste on 0393 because it continues to control the
- 21 parcel area?
- MR. McGINLEY: Objection. The document
- speaks for itself.
- THE WITNESS: It just states that

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regarding causing or allowing it to be there.

110

- Sorry?
- MS. BRICE: Can we take a break.
- MR. McGINLEY: Sure.
- (Brief recess.)
- (Gobelman Exhibit No. 6 marked for
- identification.)
- MS. BRICE: We're back on the record.
- BY MS. BRICE:
- 10 ο. Mr. Gobelman, I placed in front of you
- what is the Illinois Pollution Control Board's 11
- December 15, 2016 order. 12
- 1.3 Have you read this order? I believe you
- testified you read it at one time.
- I'd like to direct your attention to the
- third paragraph and in particular the last sentence 17
- of the third paragraph. It says: 18
- IDOT also continues to 19
- 20 control a parcel south of
- Greenwood where asbestos waste is 21
- located. IDOT therefore violated 22
- 2.3 the act by causing or allowing
- open dumping of waste, conducting

112

- they've -- they're in violation of the act
- BY MS. BRICE:
- Okay. Let's just go to Page 13. Three
- lines down:
- By continuing to control the
- portion of Parcel 0393 falling
- within Site 3, IDOT continues to
- allow ACM waste in the soil.
- Do you see that?
- 11 Yes
- 12 And they're tying IDOT's liability to
- controlling Parcel 0393; is that correct?
- MR. McGINLEY: Objection; the document
- speaks for itself.
- THE WITNESS: They're stating that the 16
- Parcel 0393 falls within Site 3. 17
- BY MS. BRICE:
- Okay. And the second part is that IDOT
- continues to allow ACM waste in the soil --
- MR. McGINLEY: Same objection. 21
- BY MS. BRICE:
 - -- on Parcel 0393; is that right?
- Yeah. There's ACM material within the

- 1 soil within 9393 -- 393, not 9393.
- 2 Q. You say on Section 5.2 that you disagree
- 3 with Mr. Dorgan's interpretation of the IPCB
- defined area of responsibility to include Parcel
- 5 0393.
- 6 Why?
- 7 A. Where are you at in my report?
- 8 Q. Page 5, 5.2, last paragraph.
- A. Because Mr. Dorgan interpreted that the
- 10 board ruling was for the entire 393 right of way
- 11 where the board specifically stated that it's only
- 12 associated with the borings that they laid out in
- 13 the ruling.
- Q. That's your interpretation of it,
- 15 correct?
- 16 A. Yes.
- 17 O. Okay. Let's go to your report and
- 18 Figure 3 that we've got here. I can't tell, but
- 9 I'm asking: Do you agree that the Waukegan water
- 20 line on Site 3 is located within 0393?
- 21 A. That's how it was depicted in the final
- 22 report that that's where it lies. It lies in or on
- 23 the boundary.
- 24 Q. Right

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115

- 2 time, the exact location.
- Q. Do you know where they thought it was
- 4 located?
- 5 A. I believe based upon the work plan and
- the final report it stated that it was roughly
- 7 50 feet south of where they found it.
- Q. 50 feet south of where they found it?
- 9 A. The original -- well, originally it's 50
- 10 feet south. The original location they thought it
- 11 was is roughly 50 feet south of where it actually
- 12 is.
- 13 Q. Okay. You say here on Page 5 of your
- 14 report that this is 5.2 on the second -- the last
- 15 sentence:
- 16 Making the extent of the
- 17 eastern edge of Parcel 0393
- 18 removes arguments of the location
- of BP45 given the difference
- 20 between my location and
- 21 Mr. Dorgan's location as 4.7 feet
- 22 and the location of B345 as
- 23 scaled off a map and the exact
- 24 location was not identified.

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114

- But this is Gobelman 1, so --
- 2 A. That's how --
- Q. -- based off of Gobelman --
- 4 A. That's how I depicted it on the report.
- 5 Q. So you believe it's located entirely
- within 0393, the line, on Site 3?
- 7 A. I didn't necessarily make that
- 8 interpretation in my report. In the line, it shows
- 9 it's either in or on or -- the boundary.
- 10 Q. Do you agree that USEPA required JM to
- 11 address ACM involved with the Waukegan water line?
- 12 A. I believe they required them to address
- 13 a clean corridor for any utility that was to remain
- 14 in the site.

21

- 15 Q. And costs were incurred with respect to
- 16 the water line?
- 17 A. I would assume so.
- 18 Q. And was it known at the time of the
- 19 hearing that the Waukegan water line was located
- 20 entirely within 0393 on Site 3?
 - A. Say that again.
- 22 Q. Was it known at the time of the hearing,
- 23 the last hearing, that the Waukegan water line was
- 24 located entirely within 0393 on Site 3?

116

- 1 What are you saying here?
 - 2 A. One of the board ruling was IDOT's
 - 3 liability was based upon the location of B43- -- or
 - 4 B45 in that if it -- in essence, that if it lied
 - 5 within the IDOT's right of way 393, then IDOT would
 - $\,\,$ be liable for that particular boring. And if it
 - 7 lied outside it technically wouldn't be liable for
 - 8 it. And my approach to this was that it didn't
 - 9 matter whether it was inside or outside as far as
 - 10 $\,$ the allegation was concerned.
 - Q. Why is that?
 - 12 A. Because I looked at this as an exercise
 - 13 of not arguing over dollars and cents but of
 - 14 general numbers in that if I were to make an
 - 15 argument that IDOT is not responsible for 4393,
 - 16 therefore, then the extent of the liability in that
 - 17 area would go back some distance to the west to
 - 18 $\,$ reflect that somewhere between B350 and B345 would
 - 19 be the extent within the right of way of IDOT's
 - 20 liability.

11

- 21 But if you look at the process at which
- 22 I allocated the cost, that's only a difference of
- 23 maybe 5, 10 percent of the cost associated with
- 4 whatever is going to go through that area that

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would be affected. And I didn't think it was worth

- my time dealing with that -- that concept of -- it
- was just as easy just to say IDOT will take all the
- liability to the edge of their -- to the farthest
- east to that area as opposed to spending hours
- fighting over where the line should be drawn
- between the two and whether or not the argument
- between Dorgan and my report of saying who actually
- has the actual location written of where B345 is.
- 10 Okay. Are you saying B345 is an IDOT
- area of liability or not? 11
- In the way I have it depicted as
- technically outside of IDOT's liability.
- But are you including it in --
- 15 But I am including it in the area that
- would have been associated with it as if it was in 16
- as part of IDOT's liability to the extent, the 17
- eastern extent of the right of way.
- Okay. You claim that IDOT's responsible
- from 1S to 4S on Site 6, right?
- I don't claim that. That's what the 21 Α.
- 22 board claims.
- Okay. But you argued that Mr. Dorgan
- said IDOT is also responsible for 5S to 8S, which

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trying to --

- Α. I'm just -- My point was that Detour
- Road A didn't have material placed in there.
- Do you have any evidence to rebut the
- statements made by Mr. Peterson concerning the
- consistency of asbestos to 1S to 8S?
 - Α. No.
- Okay. Let's look at Figure 3 again in Ο.
- your report.
- 10 Why is the reason that you didn't
- include the water line -- what is the reason for 11
- not including the water line in the IDOT
- attribution?
- Because according to the board we were
- 15 only liable for up through B25 and I have marked on
- there what is B326 was not included, which was 16
- also -- didn't detect asbestos but the board didn't
- include that in its ruling so, therefore, the water
- line lies farther west than B26 is and so,
- therefore, it's outside of what the board ruled.
- 21 Okav. If the board did rule that IDOT
- is liable for all of 0393, the water line would be
- attributed to IDOT; is that correct?
- MR. McGINLEY: Objection; calls for

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118

- vou disagree with --
- Α. Correct.
- -- right?
- And, as I understand it, your point is
- based upon the fact that what the board said was
- that if IDOT used fill for Detour Road A that
- construction? Is that your point? And so
- therefore there was no ACM left?
- 10 There was no -- my point has always been

contained ACM, that fill was removed at the end of

- 11 there was no ACM placed there in regards to the
- 12 detour road. And I believe the board's ruling in
- 1.3 the way they ruled was 1 through 4 has to do with
- the embankment -- what they argued was -- the
- argument was is that the embankment work of Greenwood Avenue has nothing to do with the --
- Detour Road A. 17
- Okay. So your rebuttal is based upon 18
- the Detour Road A; is that right? I'm just trying
- 20 to understand it.
- My rebuttal is that the board ruled that 21 Α.
- 1S through 4S is what IDOT is liable for. 22
- 2.3 Okay. But when you explain it in your
- report, you talk about the Detour Road A. I'm just

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120

- speculation.
 - THE WITNESS: If the board ruled that
- IDOT was responsible for all the right of way
- within 393, then IDOT would be liable for a
- portion of the water line that ran through
- its area.
- BY MS. BRICE:
 - Why would it only be liable for a Ο.
- portion of the water line that runs through its
- 1.0
- 11 Because the corridor was 25 feet wide.
- and a portion of that 25 feet runs outside of the
- right of way.
- Okay. But that's based upon Gobelman 1,
- correct?
- 16 Α. That's based on how it's depicted in my
- 17 figure, ves.
- Figure 4, please.
- What work was done with respect to the
- 20 utilities, the AT&T lines?
- I believe the utilities had to be 21 Α.
- removed or abandoned, those utilities.
- Who did that work?
 - I believe the utility did it.

- 1 Q. Okay. Anything else?
 2 MR. McGINLEY: Objection; vague and
- 3 ambiguous.
- 4 BY MS. BRICE:
- 5 Q. Was there any other work done with
- 6 respect to the AT&T utilities that you know of?
- 7 A. They had things on hold, but I don't
- 8 know specifically at this second.
- 9 Q. Did they do any excavations?
- 10 A. I can't remember sitting here whether or
- 11 not there was excavation. I thought there were.
- 12 Q. You used linear feet, right?
- 13 A. Correct.
- 14 Q. Why?
- 15 A. To give the ratio between what was
- 16 actually the footage of the length within the
- 17 entire site, reverses, what was associated with the
- 18 borings that IDOT was liable for.
- 19 Q. Okay. If there were -- we'll save that.
- 20 And what was wrong with Mr. Dorgan's
- 21 approach?
- MR. McGINLEY: Objection; vague and
- 23 ambiguous.

BY MS. BRICE:

as IDOT's liability.

Ω

Α.

Ο.

problem?

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11

12

1.3

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20

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dealing with AT&T lines that you disagreed with.

that -- if a line touched TDOT's right of way or

automatically 100 percent of the work associated

Why do I believe what?

were two lines in, one line out, so IDOT is

else, are you -- why is this touching point a

fact that it doesn't account for what the board

ruled as IDOT's liability, and it accounts that

responsible for two-thirds of the cost.

with those lines got IDOT'S liability -- is charged

And why? Why do you believe that?

What justification do you have for that

Because these reports lay out that there

But why if it doesn't touch anything

Because it's -- it's not taking into the

Why was it wrong?

anywhere associated with IDOT, that it

Okay. Mr. Dorgan had an approach to

I disagreed with that the concept of

- there's portions of how the lines lay out that may
- 2 not necessarily be outside. It's just taking a
- 3 two-thirds multiplication off the total cost, not
- 4 accounting for how it lays.
- 5 Q. Let's took B326 here, okay, on your map.
 - Is that one -- sorry.
- 7 Which one was the one that was -- B326,
- 8 does it have asbestos in it or not?
- 9 A. It was -- it did not have asbestos when
- 10 they did it.

11

- Q. It did not have asbestos in it.
- 12 So did -- B315 had asbestos in it,
- 13 though; didn't it?
- 14 A. Yes.
- 15 Q. Okay. And B315 is a 50 by 50 foot grid,
- 16 is it not, in the way it was sampled?
 - .7 A. Yes.
- 18 Q. Do you depict that 50 by 50 foot grid on
- 19 here?
- 20 A. Only in the ones that are shown.
- 21 O. That's 50 by 50 feet?
- 22 A. I believe so.
- Q. Did you actually scale that off?
- 24 A. Yeah, I believe that's how they were put

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124

122

- 2 O. Your intention was at least for it to
- 3 covered 50 by 50 feet?
- 4 A. It was the intention that it would cover
- 5 the spacing between the borings was 30 feet.
- 6 Q. Right. But it's a square, 50 by 50
- 7 feet.
- 8 A. No.

on there.

- 9 Q. No
- 10 A. No -- I mean it in the placement of the
- 11 borings. There was a boring to the outside of the
- 12 right way of that was 50 feet --
- 13 Q. Understood. Understood.
- 14 So are you saying that USEPA did not
- 15 require them to excavate an entire 50 by 50 foot
- $\,$ 16 $\,$ area if there was an ACM found within that 50 by 50 $\,$
- 17 foot grid?
- 18 A. No. I don't believe they required them
- 19 to excavate in that manner.
- 20 Q. And given the way that Gobelman 4, which
 - is based on Gobelman 1, is depicted, fewer of the
- 22 AT&T lines go through Parcel 0393 than they do on
- 23 Dorgan 1; isn't that correct?
- A. I don't know. I'd have to compare it.

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- I used the AT lines were based upon Dorgan's lines
- because that's the only map I found had the lines
- (Witness peruses document.)
- THE WITNESS: Yeah. I would say yeah,
- that's up with the lines. He showed more
- lines that were inside the right of way than
- BY MS. BRICE:
- 10 So I do want to talk about utility ACM
- soils excavation. You don't have any figure on 11
- Why is that?
- Excuse me. Α.
- 15 You don't have a figure that relates --
- You have figures that relate to all of the other 16
- task buckets or a lot of them. You don't have a 17
- figure that relates to utility ACM soil excavation.
- Is there a reason?
- I believe -- Let me take a look at 20
- this -- those were based upon -- the allegations 21
- 22 were based upon the percentage of the other task
- What type of excavation work was

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I believe it varies. There was some

- variance in the width and that, based upon the --
- where they can excavate.
- Okay. So given that there was variation
- and material removed, why didn't you use volume to
- determine liability?
- Α. There was no away of depicting what the
- actual volumes were through those areas.
- Did you look through all the documents?
- Best I could look through all the
- 11 documents, yes.
- 12 Would volume of the excavation been a Ο.
- reasonable way to assess IDOT liability for soils
- and utility excavation?
- That would be a reasonable way if you
- had the volume for everything and the specific 16
- volume was for the area within IDOT's liability,
- defined and marked, yes.
 - Would it be more appropriate than linear
- 20 feet?
- 21 I don't know if "more appropriate" is
- the right way of saying it. It's equally
- equivalent.
- Ο. So you have this 197 linear feet.

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edge of Site 6, is that correct, all the way to the

126

- involved in Site 6; do you know?
- Α. Um.
- All of Site 6?
- My understanding that created a clean
- corridor no matter what for the entire site.
- Ο. For the whole northern boundary of
- Site 6 and the whole southern boundary of Site 6?
- Yes. I believe they did excavation Α.
- associated with that, yes.
- 1.0 ο. So clean corridors the whole way?
- 11 Α I believe so, yes.
- Ο. And let's just take 1S through 9S -- Or 12
- 1.3 let's take, yeah, 1S through 9S.
- Do you know how deep the excavation was?
- Not off the top of my head. I thought
- it was somewhere around 4 to 5 feet or something
- like that. 17
- Okay. Do you know how wide it was?
- The width went to the edge of pavement
- 20 and then it -- to the edge of -- you know, to the
- Site 3 area. 21
- Okay. Did it vary in depth at different 22
- 23 points in time along Site 3 -- along Site 6, 1S
- through 9S?

128

- That's from the western -- the western
- middle of 4S?
- No, sorry. That's not right.
- How did you come up with the 197 linear
- feet?

16

- (No response.) Α.
- Actually, let me help you.
- 1.0 I'm trying to figure where you're at.
- 11 You calculated the total feet, correct,
- 12 for the north side and the south side of 6, right?
 - Α.
- And that's because you said that there
- was -- and that you came up with 5470, right?
 - Α. Correct.
- 17 And then you measured 1S through 4S to ο.
- get up to 197; is that right?
- I just measured the length that the line
- was in 6. between that -- that would have been
- allocated between 1 and 4. It wasn't the number
- you gave. It was only 47 in Site 6. 22
- What page are you on?
- 8; 6.3.2.

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- Ο. It says 197 linear feet.
- Oh. I thought you were still talking
- about the utility. I'm sorry. I thought you were
- still with the telephone line.
- No, no, no. We were talking about the
- utility and the soils excavation, and we talked
- about the length of Site 6 on the north side and
- the south side and the clean corridors, right?
- Right. There's 196 from the edge of --
- from the western edge of Site 6 to the halfway
- point between 4S and 5S. 11
- Okay. Okay. Did you account the common
- fiber optic line at all?
- А.
- 15 Ο. Why not?
- Α It wasn't in the task budget that 16
- Mr. Dorgan used and so it's, in essence, I assume, 17
- accounted for in the utility excavation.
- Okay. We're going to go to North Shore
- Gas, Figure 5, and Page 9 of your report to keep us
- 21 on track.
- Α IIh-huh
- Okay. As I understand this, this --
- Actually, I think we already covered that.

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- Α. Because it falls outside of the right of
- 2 wav.
- Here you seem to be using square feet? Ο.
 - Α.
- Area. Okav.
- Is that volumetric area because it's a
- clean corridor or something else?
 - No. I used area to represent the
- 25 foot width that the corridor had to be.
- 10 And why did you not do that with respect
- to other areas and use linear feet? Why was that 11
- more appropriate here? 12
- Because it was a larger excavation, and
- it wasn't clear on the telephone what type of
- excavation they did or abandonment in place, some
- of it was. So there wasn't necessarily a 25 foot 16
- corridor in place for the AT&T lines.
- Northeast excavation. Let's look at
- that.
- 20 What work was actually done here?
- 21 They excavated a larger area in depth in
- this particular area.
- Sorry. What are you referring to?
- I don't know. I thought we were

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132

130

- Why did JM have to create a clean
- corridor for North Shore Gas on Site 3?
- They had to create a clean corridor for
- whatever utility was going to be placed or
- potentially placed.
- Notwithstanding there was ACM anywhere?
- My interpretation of what they're
- referring to is it had nothing to do with the ACM
- or where it was located. It's that because of
- 10 the -- there was a potential that a clean corridor
- 11 had to be created.
- 12 Why did you consider none of site -- the
- 1.3 North Shore Gas line on Site 3 to be attributed to
- A. I'm sorry. You lost me on that.
- 16 Ο. Okay. So we're on Figure 5?
- 17 Α. Yes
- You've got red. 18
- 20 Α.
- 21 Ο. And you gave that a zero allocation is

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- my understanding? 22
- 23 Α. Yes.
- Okay. Why?

- referring to the northeast excavation.
 - I am, but larger area and depth --
 - Well, that square -- rectangular area
 - they had to excavate a specific area to remove
 - asbestos-containing material.
 - Okay. Do you know what they actually
 - did or how much they actually excavated?
 - Volume-wise, no, I don' know how much
 - volume they removed.
 - 1.0 ο. Would volume be an appropriate basis to
 - determine IDOT liability with respect to the
 - 12 northeast excavation...
 - Α.
 - ... if you had that information.
 - It could be equivalent to what I did,
 - 16 ves.
 - Do you know if the excavation varied in 17 ο.
 - depth along the locations?
 - I belive they had it depicted like in
 - thirds in one of the figures. In, I think, one of
 - the sections was not as deep as the other ones.
 - Do you remember which one that is? 22
 - Not exactly. I -- which one was deeper.

Okay. Did you account for the fiber

- excavation here at all?
- Okay. I want to talk about dewatering,

optics line that runs through the northeast

- which is on Page 11.
- Can you describe your approach here?
- I used the same approach that Mr. Dorgan Α.
- did in his report.
- Ο.
- 10 Α. Well, based upon my allocations in the
- 11 process.
- 12 ο. Can you explain your allocations?
- (Witness peruses documents.)
- THE WITNESS: Well, as stated in 671, I
- took what I had calculated as IDOT's 15
- responsibility for the defined area by 16
- pollution control board in Site 3 which was 17
- 103,462 by the total cost to complete the
- work for the Nicor, North Shore Gas, the
- Waukegan water line, and the northeast 20
- excavation, which was 661,585, which came up 21
- to percentage of 15.6.
- BY MS. BRICE:
- Right.

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- Q. Okay. Is there anything else that you
- did different with respect to Site 6 as compared to
- Well, it was a different -- I used the
- same calculating method that Mr. Dorgan did in his
- report for Site 6. It's different than how he
- calculated Site 3.
- Okay. Understood.
- Sites 3 and 6, as I understand it, you
- used the exact same process, Mr. Dorgan did, you
- just had different numbers? 11
- Correct. 12
- Okay. Where did you get -- why are you
- getting -- I assume you're giving IDOT a zero
- percent liability for the ramp work because you
- 16 don't think they're responsible for 0393; is that
- right? 17
- That far west, correct.
 - Where did you come up with this on
- Figure 7 that the ramp work was done this far west?
- 21 It's depicted on Figure 7 of your report. What's
- the source of that?
- The source of that is also depicted on
- the final dealing with the storm limits, and it's

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136

134

- percent here? You did this first -- there's an
- earlier calculation to get to the 103, and then you

But aren't you taking a percent of a

- compared that to the total cost for all four lines.
- Why is that the right way to do it?
- approach that Mr. Dorgan did, and he calculated the

I believe this is the exact same

- costs what he believed was the -- attributed to the
- board -- his interpretation of what the pollution
- control board had for Site 3. He came up with that 10
- number of what he thought was IDOT's responsibility 11
- 12 for in Site 3, and he divided it by the same number
- 1.3 which was the other -- the three excavations.
- Okay. So let's look at -- so that was
- Site 3. Let's look at Site 6.
- 16 Did you do anything different with
- respect to Site 6 or did you do the same thing? 17
- 18 I did the same thing, except I utilized
- the number that is associated with 1S through 4S
- where Mr. Dorgan used -- he included the area 20
- associated with 1S denied. 21
- Okav. 22
- 2.3 And never calculated actual linear feet
- of the impacted area.

- in the final -- it's depicted also on the Google
 - Earth map of where it lays out because they had to
 - do it because they could not get into those areas
 - because it was too wet, and they're afraid with
 - erosion and stuff like that, the water that they
 - put in a ramp stone base so that it would be more
 - stable in that area.
 - Okay. So what you're depicting here Ο.
 - is -- I'm confused, as to what you said it was
 - 1.0 depicted on.
 - 11 Α Well, it showed that the -- the stone
 - 12 limits were shown on the --
 - 1.3
 - -- 40322. It's also shown in the Google
 - Earth map when you look at -- what it looks like
 - 16 the day, you can see the stone halfway covered up
 - with water. The final report talks about the ramp 17
 - had to the placed in there because of the water issues in that particular area.
 - 20 Okay. So the ramp work you're talking
 - 21 about is placing this stone ramp; is that correct?
 - 22 Α. Yes.
 - Okav. Got it.
 - Filling and capping. Why did you

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- 1 disagree with Mr. Dorgan's approach?
- 2 A. For Site 3, the difference is is that I
- 3 only take into borings associated with IDOT's
- 4 liability and taking that all the way to the first
- 5 clean boring, and I believe Mr. Dorgan took
- basically the entire right of way as our liability.
- 7 Q. Okay. So that's what you disagree with
- 8 is that he used the entire right of way?
- A. Yes. I only depicted the borings that
- 10 we were liable for.
- 11 Q. Okay. Is there anything else that you
- 12 disagree with in his approach with respect to
- 13 filling and capping?
- 14 (Witness peruses document.)
- 15 THE WITNESS: Yes. He took those
- 16 areas -- the five buckets for excavation that
- 17 IDOT was liable for the entire area. And
- 18 what I did is I just calculated what -- the
- 9 area based upon our area, based upon the
- 20 total area.
- 21 BY MS. BRICE:
- O. Okay. Is it true that there are
- 23 portions of Site 3 where ACM was not required to be
- 24 removed?

1

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- Q. Okay. So you say that the whole area is
- 2 3.1 acres, right?
- A. Correct.
 - Q. My question is pretty simple.
- 5 Was ACM excavated out of all of those
- 6 3.1 acres?
- 7 A. I don't recall at this time.
 - Q. So it could have been or it couldn't
- 9 have been -- I mean -- Sorry.
- 10 But it could have been?
- 11 A. I didn't figure that into -- I didn't
- 12 figure the ACM into my area of calculation.
- 13 Q. Okay. Let's just say ACM wasn't removed
- 14 out of all of the areas.
- 15 Would that make a difference in how you
- 16 calculated it?
- 17 A. I don't believe it would change because
- 18 it's dealing with capping the entire site, and so
- 19 the entire site was capped whether ACM was removed
- 20 or not
- 21 Q. But what were the drivers for causing
- 22 the entire Site 3 to be capped?
- 23 A. That in most of the site either surface
- 24 or subsurface there was ACM found.

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138

- A. ACM, per se, wasn't necessarily
- completely removed. So that's why they installed a
- 3 cap on the system. But the entire area had some
- 4 part of excavation done to it.
- 5 Q. The entire, however many acres? The 3.1
- acres, all of it was excavated?
- 7 A. To me it looked like there was
- 8 disturbance on -- in all the areas when they had --
- 9 when they had to put the cap in.
- 10 Q. Right, right, right.
- 11 But I'm talking about because of
- 12 locations of ACM was the entire area excavate- --
- 13 Was ACM excavated out of all 3.1 acres?
- 14 A. Wait a minute.
- 15 3- --
- 16 Q. Well, you say 3.1 acres.
- 17 A. Of dealing with the --
- 18 Q. Of Site 3.
- 19 A. 3.1 area is of the right of way, not of
- 20 the entire site.
- 21 Q. I'm looking at Site 3. So let's not get
- 22 confused. Let's go to Page --
- 23 A. All right. You're right. You're right.
- 24 You're right, 3.1. I was confusing my sites.

140

- Q. And was that along the utilities or where?
- 3 A. It was everywhere.
- 4 Q. So there was ACM everywhere excavated?
- 5 A. I don't recall specifically today
- 6 whether or not there was actual excavation to
- 7 remove all ACM from the entire site. I just know
- 8 that the site was completely capped, and that's the
- 9 basis upon the comparison of the areas. The
- 10 capping of the site area compared to the area that
- 11 IDOT's liable for.
- 12 O. Did the board make any finding that
- 13 $\,$ anyone other than IDOT was liable for ACM at
- 14 Site 3?
- 15 A. I don't believe that was a subject to
- 16 the ruling.
- 17 Q. Okay. Site 6.
- 18 What was wrong with Mr. Dorgan's
- 19 approach on Site 6?
- 20 A. He took the approach that a -- based
- $21\,$ $\,$ upon the number of utilities that were on Site 6 $\,$
- whether on the north or to the south that IDOT
- would be liable for -- since two of the utilities
 were on the southern end and two were on the north

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end, that IDOT is responsible for all of it associated with the southern end, 50 percent. And

in my approach was to take actually what was IDOT's

responsibility for the specific area of the borings

that were impacted.

- And in coming up with your number
- like -- with respect to the utilities, I think this

is the same. Let me just double check.

- Yeah, this is the same 5470 linear feet
- number, so the calculation that you used for soil
- utilities would be the same here, right? 11
- Same approach, right.
- I think that on general site preparation
- you agreed with Mr. Dorgan's approach.
- 15 Am I right about that? You just had
- different numbers? 16
- Α. Yes. And how he calculated it is the 17
- same way I calculated it.
- Okay. Same for health and safety?
- Α. 20
- 21 Ο. And the same for EPA oversight?
- Α
- And the same for costs for legal support
- services, right?

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documents?

- Α. Yes.
- Did you ask people at Andrews to look

143

144

- for these documents since some of the questions
- relate to documents in their possession?
 - I believe I asked the people who
- invoiced to make sure I had the right invoices in
- our computer system that was billed out.
 - Okay. What about anybody else?
- 10 I don't believe I asked anybody else for
- anything. 11
- Ο. 12 Did you ask Mike Nguyn for his emails?
- I had all his emails.
 - Well, did you ask him for his -- the
- 15 copy of his emails?
 - No. I did not do that.
- MR. McGINLEY: Just for the record, his 17
- name's Nguyn. It's pronounced
 - Win (ph.). It's a Vietnamese name, but
- that's the general --20
- 21 MS. BRICE: Really?
- (Gobelman Exhibit No. 8 marked for
- identification.)

16

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142

- Α Yes
- Are you aware whether the IDOT or AG's
- office has any plans to have anyone else dispute
- the costs in this case?
- A. I have no idea.
- Okav.
- MS. BRICE: Can we mark this, please.
- (Gobelman Exhibit No. 7 marked for
- identification.)
- 1.0 BY MS. BRICE:
- 11 Ο Before I ask about that, just one
- question. 12
- 13 Did anyone else write any portions of
- your report?
- A.
- You were the only person that wrote it?
- 17 No one wrote a sentence or a paragraph or anything?
- 18
- Okay. I've handed you what's entitled
- 20 Notice of Filing and Service.
- Have you seen this document before? And 21
- we are at Deposition Exhibit 7. 22
- 23 Α.
- Did you personally look for all of these

BY MS. BRICE:

- Okav. I have marked Deposition
- Exhibit 8, legal contract services, in front of
- vou.
- Do you recognize this?
- Is this contract specific to the work
- that you have done on this case?
- It's the contract that I'm covered under
- 1.0 for this case, yes.
- 11 0 Is there any other work with IDOT that's
- covered under this contract?
- Α. None that I am working on.
- Is there any that you are aware of?
- There is no other work being done under
- this contract other than for this. That was my question. Okay. 17
- If you can turn to -- So SG0021, you can
- see Curtis Ryan's doing a lot of work in January of
- 2017.

16

- 21 Do you see that at the top?
- Yes.
- Okay. CAD edits, new figure, surface
- edits and figure edits for Steve G.

2 Test Lead to Lind Tilly 19. No country of the Cou

- 1 What's he doing here? Why is he doing
- 2 surface edits and to what?
- 3 A. That was where we were looking at the
- 4 original figures that you had showed before, of
- 5 playing them in there and seeing how it relates to
- the board's ruling.
- Q. Right. But he's editing them.
- 8 A. Well, based upon what I told him to edit
- 9 on it.
- 10 Q. Okay. What did you tell him to edit?
- 11 A. I have no idea being it's over a year,
- 12 year and a half ago, 19 months ago.
- 13 Q. Okay.
- 14 A. Because it would be that he put
- 15 something in there, and I didn't like or thought he
- 16 misinterpreted what I said, so I had him edit it
- 17 to -- to what I wanted it to show.
- 18 Q. Does he still work for Andrews?
- 19 A. No.
- 20 Q. Where does he work now?
- 21 A. I have no idea.
- 22 Q. When did he leave?
- 23 A. I think last -- summer of '17, I think.
- Q. When he says surface creations, what

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- ever change your methodology at all with respect to
- 2 approaching IDOT's cost liability?
 - 3 A. Yeah. I think there were some changes
- 4 $\,$ in how I had -- from the original thought process
- 5 to the end.
 - Q. Okay. What were those?
- 7 A. I think originally I was doing more of a
- 8 linear based, and then I changed in some of the
- 9 areas according to the pipeline as being area
- 10 based
- 11 Trying to think if there's any other
- 12 issues that have changed with. I think that's the
- 13 only one that pops in my mind that I know I changed
- 14 my approach on.
- Q. When did you do that?
- 16 A. The change in the approach?
- Q. (Nodding.)
- 18 A. I don't know. Once I really started
- 19 working on my rebuttal I think is when I finally
- 20 made that change looking that way.
- 21 Q. And why did you make the change from
- 22 linear to area?
- 23 A. Because I think it was more accurate in
- 24 depicting the true volume or the area as being

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148

146

- does that mean?
- 2 A. I don't know what he put in as far as
- 3 his notations in this thing, I assume we were
- 4 dealing with the maps -- the figures we were
- 5 creating and editing how I wanted the surface
- 6 depicted.
- 7 Q. Okay. Go further down you've got:
- 8 Gobelman developing IDOT's
- 9 cost liability.
- 10 At this point in January of 2017, what
- 11 was your -- what were you doing and how were you
- 12 viewing IDOT's cost liability?
- 13 A. I was just looking at IDOT's cost as it
- 14 relates to the board's ruling.
- 15 Q. Understood.
- A. I'm not looking at actual costs but
- $17\,$ $\,$ actually looking at percent of the areas type stuff
- 18 of looking at how -- what approach would lay out as
- 19 far as -- because I had no clue at that time what
- 20 the costs were, but it was --
 - O. Okav.
- 22 A. -- but it was the area being depicted in
- 23 the figures.

21

Q. So from January of 2017 forward, did you

- - depicted as -- as related to just a linear
 distance, in essence, allocated more costs to IDOT.
 - 3 Q. There is an entry down here, 1/3/2017.
 - 4 It says meeting coordination.
 - 5 What's that about?
 - 6 A. I suspect it was a -- I suspect it was
 - 7 probably a phone call that I had that was dealing
 - 8 with the meeting as far as the scheduling all this
 - 9 stuff.

11

- 10 Q. Which phone call?
 - A. I suspect it was probably the phone call
- 12 that I had that I was dealing with, the meeting as
- 13 $\,$ far as the scheduling of all this stuff when it was
- 14 going to happen.
- 15 Q. Which phone call?
- 16 A. I suspect it was probably a phone call.
- 17 Q. With --
- 18 A. With the AG's.
- 19 Q. If you look at SG00041 --
- 20 Got it?
- 21 A. Yes.
- 22 Q. -- (Continuing) it says:
- 23 Status update with client on
- 24 February 1, 2018.

Erected teaching in injury. Account to the intervention in injury.

Who was that with?

The AG's.

Q. Okay. On SG00047, do you see that?

4 A. Yes.

5 Q. Okay. There is -- now we've got Mike

Nguyn.

There's, sort of, three things up there.

8 There's site map. There's revised figure and

quantities, revised figured and quantities.

10 What he is changing with revised figures

11 and quantities?

2 A. Well, as we were working on the base map

and then how I wanted the quantities based upon the

distances, you know, where I wanted him to start

the line and stop the line, so who's revising those

16 quantities --

0. Quantities? They're not really --

18 A. Well, he put quantities, but he put

19 the -- it's the distances, the area, that acreage,

20 that's a quantity.

21 Q. At one point did you ever have

22 everything done with areas --

23 A. No.

Q. -- instead of linear feet --

casalereporting.com 312.332.7900 A. Yes.

O. Is this the first time you adjusted this

3 site limit?

2

A. I think that's where we were looking at,

5 the checking different sites that we had in the

6 system from previous and then overlaying and seeing

7 whether or not they were accurate -- how they laid

8 up against each other.

9 Q. So this was the first time that you did

10 that?

11

A. I can't say that's the first time.

12 That's the first time it's noted, I guess.

13 Q. Who is Lana Johnson?

A. Our admin person.

15 O. Did you ever meet with the AG here in

16 Chicago with respect to your rebuttal report?

17 A. Only, like I said, days before it was

18 due.

O. Just once?

20 A. Once, yes.

21 Q. A couple days before?

22 A. Yes.

23 Q. Did you ever meet with IDOT or anyone --

24 I mean, I know IDOT's down in southern -- or mid

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152

A. No.

2 Q. No.

At one point did you ever have anything

4 done with areas other than the North Shore Gas

5 line?

6 A. I think I looked at -- one point, looked

7 at this sort of overall, taking the entire area of

8 Site 3 and the entire area of IDOT's responsibility

9 in Site 3 in looking at and comparing the

10 percentages of those, looking at the percent of

11 IDOT's liability that way.

12 Q. You mean area-wise?

13 A. Just area-wise, yeah.

14 Q. Is there anything else that you fooled

15 around with and just sort of experimented with and

16 looking at?

17 A. No. I mean -- No. I can't think of

18 anything.

Q. On SG00051 --

20 A. Okay

21 Q. -- we have Mike Nguyn doing borings,

22 property, and site limit adjustment checking

23 multiple datas from different sources.

24 Do you see that?

150

1 Illinois, but --

A. Be careful.

Q. -- did you ever meet with anyone at IDOT

4 up here with respect to your rebuttal report?

5 A. No

6 Q. Okay. SG00059. Mike Nguyn is doing a

7 lot of things. There's one that says revised areas

8 and pipe links. This is 8/20/2018. So I imagine

9 not very long ago.

10 What was happening?

11 A. I assume I had some fixes that I wanted

12 done to the various figures. At some point we were

13 doing it all on one -- we were doing everything on

 $14\,$ $\,$ to one figure, one exhibit or whatever you want to

15 call it, and there was a point in which it got -16 to me it was just confusing; that it would be

17 better to represent each bucket or each utility

18 line that we're discussing on separate figures.

19 Q. So you don't remember specifically?

0 A. No.

21

22

O. Okay. Who is Ken Liss?

A. President of the company.

Q. I'm not going to mark this. I'm just

going to hold it up. It's something you produced.

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- 1 It says acquiring liability and avoiding it at the 2 same time.
- 3 Did you put together this --
- 4 A. Yes.
- 5 Q. And what was the message you were trying
- 6 to deliver with this document?
- 7 A. It was just a presentation. I believe
- 8 it was for the transportation research board summer
- meeting one time on dealing with IDOT acquiring
- 10 right of way in trying to avoid the management of
- 11 soil.
- 12 Q. Was that done after the hearing in this
- 13 case?
- 14 A No.
- 15 O. This is before the hearing in this case?
- 16 A. Yes
- 17 O. And it was not produced previously?
- 18 A. No. I don't believe there was something
- 19 about presentations before.
- 20 (Gobelman Exhibit No. 9 marked for
- 21 identification.)
- 22 BY MS. BRICE:
- Q. I'm presenting to you something that was
- 24 produced to us that starts SG000508.

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- A. It has nothing to do with this case or
- 2 these issues.
- 3 Q. Second page, it has November 2016, \$685,
- 4 IDOT map.
- 5 What's that?
- 6 A. I'm not sure. I think it's 685,000, I
- 7 think. I'm hard at reading my own writing, too.
- 8 Q. Well, is this a call with Evan, Ellen,
- 9 me
- 10 And who's that other person?
- 11 A. Evan and Ellen.
- 12 Q. But what's next to it?
- 13 A. Next to it.
 - Q. It's like me and Gillian or something?
- MR. McGINLEY: No. It's Evan --
- 16 THE WITNESS: Evan McGinley.
- 17 MS. BRICE: Oh, sorry. My bad.
- 18 BY MS. BRICE:
 - Q. So you think that's 685,000 IDOT map?
- 20 A. I have no idea. Not sure.
- 21 Q. Okay. There's five bullet points.
- 22 What is this outlining?
- 23 A. I don't remember at this time what it's
- 24 outlining.

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Can you tell me what this is?

- 2 A. It's copies of my logbook for a
- 3 description I quess is what it is.
- Q. And the first entry is dated what?
- A. February 28th of '17.
- 6 Q. I'd like to ask for the copies of your
- 7 logbook that go back to January of 2017 because he
- 8 was doing work in January of 2017 according to all
- 9 sorts of documents.
- 10 A. I gave you everything that I had in my
- 11 $\,$ logbook back from the date that you had in the
- 12 thing from the board ruling. This is the first
- 13 $\,$ entry that has something in it.
- 14 MS. BRICE: We can at least double
- 15 check.
- MR. McGINLEY: Sure. That's fine.
- 17 BY MS. BRICE:
- 18 Q. Can you tell me what that says at the
- 19 very end? It says something at 3:00?
- 20 A. I think we were setting up a call. He
- 21 was calling me to state that they were going to
- 22 have a call. He'd like to have a call tomorrow.
- Q. Oh, tomorrow.
- 24 Why are these things blacked out?

156

- 1 Q. Could that IDOT statement be saying IDOT
- 2 responsibility, R-E-S-P, period?
- 3 A. It could. I'm hard at reading my own
- 4 writing.
- 5 Q. Okay it says: Facts. Then it says:
- 6 2 million, I'm thinking, Site 3.
- 7 Is that what that says?
 - A. It could say that.
- 9 Q. Then does that next thing say facts?
- 10 A. Your guess is as good as mine.
- 11 Q. Okay. What is it, contamination -- what
- 12 does it say -- contour, something foresights.
 - A. Right, yes. Something for sites. I
- 14 suspect it's meeting contaminations and -- not sure
- 15 what the other word is.
- 16 Q. So is this sort of like outlining a
- 17 report possibly?
- 18 A. No; my just random notes as we're
- 19 talking. It's not doodling. But it's random
- 20 thought process while talking on the phone.
- 22 you or are these things that you're thinking about
- 23 and telling them?

21

24 A. It could go either way.

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Is this something that someone's telling

154

That, I believe, at 6 says: 25, clean corridor.

Okay. Turn the page. You've got --

- Nicor. And then 7 looks like it says fart, but I
- don't think it does.
- Α. I think facts or something like that,
- factual, something like that maybe.
- Okay. 8: Any other cost, Site 6, Ο.
- Is that what that says?
- Α.
- 11 Ο. A fact witness, is that what that is
- 12 says?
- I suspect that's what it would say.
- Then I think it says cost sharing PRPs;
- 15 is that right?
- Α 16
- Ο. And then it says fact again? 17
- Α.
- And it says completed work? Yes, no,
- something. 20
- 21 What does that say?
- Α. Then Nauvn.
- Then Nguyn.
- And it says cost -- what does it say

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- Q. And then what does the rest of that say?
- Looks like something -- like all. I
- don't know if that's supposed to be a "the" or
- something, that they incurred. Problem of docs,
- maybe, removal from site, remediation site,
- investigation, weights and manifest.
- ο. Why are you talking about weights and
- Just -- I suspect just thinking about
- the information or whether or not there was
- 11 manifests.
- 12 Ο. And could go to volume issues --
- Volume issues, yeah.
 - Okay. 512, kind of halfway down, there
- is the word cost.
- If you can just read the rest of that 16
- 17 for me.

21

- That's: Cost something doc -- documents
- or lots. Jennifer, bank no longer at bond or bank
- or something.
 - Ο. What does that have to do --
- I have no idea.
- Interest in extent of which defining

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158 160

- after that?
- Α. Investigate, investigation.
- ο. 1-452
- 1 to 4S, Site 6.
- Ο. Site 3?
- Α. And then Site 3 just Bs, not nearly
- putting down the boring numbers.
- Okay. And then facts.
- And so does looking at this now give you
- 10 any more information about what that conversation
- 11 was about?
- 12 Α. I suspect we were going through the
- 1.3 board ruling.
- Okay. But you don't know?
- A. No, I don't.
- Go back for one second.
- Do you know why on Page 8, which is 509, 17
- you say November 2016? 18
- I don't know.
- Q. Let's go back to Page 9, which is
- SG00510. 21
- It looks like production doc; is that 22
- 2.3 right?
- Okay. Yeah.

- docs or -- I'm not sure what a --
 - Adjusting? Ο.
 - I don't know. Total cost for Site 3
 - and 6 property maybe, proportionate maybe.
 - On 514 there's something that says:
 - Foundational cost document, question cost
 - documents, good/bad cost.
 - What you are intending to say by
 - good/bad costs?
 - 1.0 Α. I have no clue.
 - Then it says walk through security
 - billing process? Is that what it says? 12
 - Α. Scrutiny in billing process.

 - Okay. Next page it says contact Ellen. 16 ο.
 - Who is --17

11

- Α. Continued, Evan.
- Who is general contractor, who works for
- 21 who, Monday call.
- Is that what it says? 22
- Okay. So then we're on 00517.

On 419 it looks like a call with Evan,
report would, what?

A. Think we were...

Q. It looks like board opinion was wrong?

A. Yeah. Underneath it says board opinion

was wrong. I think we were talking about at that

time Dorgan's -- his report that he thought the

8 board's opinion was wrong. I'm not sure what the

date of it -- I assume that's...

10 Q. Could it be that you guys were saying

11 the board opinion was wrong?

12 A. Well, that wouldn't be Dorgan's report

13 either, so I'm not sure.

Q. Okay. Next page, on 518, Evan,

15 Manville, AG, debt Campanella Construction on

16 Monday, question, what cost and cutting out of

17 3, 6.

18 Is that what it says?

19 (Witness peruses document.)

THE WITNESS: I think that's saying

21 that, but cost and cutting out of Site 3

22 and 6.

23 BY MS. BRICE:

Q. What does that mean?

casalereporting.com 312.332.7900 What does that mean?

A. That I thought his cost attributes were

3 a simple approach.

Q. Okay. Then it says something cleaned

5 similar narrative or something?

A. Draft -- looking at it, clean, simple

7 narrative.

Q. Okay. Transcript early next week.

Meeting Tuesday, go over report?

10 A. Where are you at?

Q. Next page.

12 Is that what it says?

13 A. Yes. That looks like what it says.

Q. And did you have a meeting to go through

15 the report?

11

16 A. We had a meeting up here to go over the

17 report, yes.

18 Q. If we can look at Exhibit 3, you've got

19 on Figure 1, SG003754, which we talked about

20 earlier, a little red, you know, enclosure.

21 What was that supposed to signify?

22 A. I don't know what page you're on.

23 Q. I --

24 A. Did you say?

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164

162

T have no idea.

Q. Does it mean you're trying to cut costs

out of liability?

Α

4 A. I believe it was -- I believe the call

5 was in reference to -- they were doing the

Campanella deposition, and I had -- I guess there

7 was something I asked them about things I was --

8 would like to know.

9 Q. Okay. And this 8 million and final

10 $\,$ 1.5 million below that, that's about the Campanella

11 contract, right?

A. I think so.

13 Q. I'm looking at SG00, I think it's, 525.

14 I'm not exactly sure. There's actually a missing

15 page.

12

16 MR. McGINLEY: What's the page number

in the upper right-hand corner?

MS. BRICE: 270. But it does look like

we're missing a page, like 526 -- Or maybe

20 that's 526; is it?

21 THE WITNESS: That's 526.

22 BY MS. BRICE:

Q. Got it. Thanks. 8, 3. You've got

24 Dorgan cost attributes simplify.

1 O. I did say.

2 A. Oh, I'm sorry.

3 Q. That's okay.

4 What was that supposed to signify this

5 time? And this is April 2018.

A. I think it was signifying the areas

7 outside of the corridor, the pipeline corridor, but

8 inside the northeast excavation.

9 Q. Okay. If you turn two pages, is this

10 the same thing; it's just overlaid on the Google

11 images map?

12

A. Yes. It looks like it, ves.

Q. Okay. If you can turn to SG003762.

14 Do you see that?

15 A Yes

16 Q. So you've got what looks like 1S to 4S

17 that you've got in a hashed mark and then you've

18 got south of that on Site 3 a whole larger area of

19 hash marking going all the way to the eastern

20 boundary of Site 3.

21 What are you depicting here?

22 A. It was a draft that we were working on

depicting northeast excavation. And in providing

4 the distances from 9S to the beginning of

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- northeast, the CAD guy happened to highlight that
 distance also thinking that was part of it.
- 3 O. You didn't ask him to do that?
- A. No. I asked him to put the northeast
- 5 excavation 140 feet from 9S, and he sort of boxed
- that in himself.
- 7 MS. BRICE: Okay. Can we take a quick
- 8 break, and we'll be done.
- (Brief recess.)
- 10 (Gobelman Exhibit Nos. 10 11 and 12,
- 11 marked for identification.)
- 12 MS. BRICE: Back on the record.
- 13 BY MS. BRICE:
- 14 Q. I've marked as Exhibit 10 that I have
- set before you, it is SG0000726. It says from
- 16 Steven Gobelman to Lana and Stephanie Brumley, and
- 17 it says:
- 18 I have tracked changes in
- 19 the Word document that I need
- 20 accepted and re-PDF'd.
- 21 And then there's attachment to it, but
- 22 there's no tracked changed.
- 23 A. The track changes -- by the time I do
- 24 this, track changes are gone. The word -- the

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- A. I think it was the -- it's referring to
- 2 the USEPA final report, so I assume it's referring
- 3 to the final report from -- that was created by the
- 4 accountant.
- 5 Q. And you were sending it to Mr. McGinley?
- A. No, I don't believe so. There's nothing
- 7 attached.
- 8 Q. Okay.
 - A. I think that was more of a question.
- 10 Q. But Ms. McGinley says: Thanks for the
- 11 information.
- 12 Do you have any recollection of what
- 13 this was about?
 - A. No.
- 15 Q. Okay. Let's look at the next document,
- 16 please. This is Deposition Exhibit 12, SG003643
- 17 and 3644, two-page document. It's an email from
- $\,$ 18 $\,$ you dated May 9th, 2018 to Mr. McGinley where you
- 19 attach a Site 3 excavation figure, and you say to
- 20 him: Does this work for you?
- 21 How did he respond to you?
- 22 A. I don't know if there was a response.
- 23 Q. You have no recollection of any kind of
- 24 response?

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168

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wordsmith-ing that she did.

- Q. Right.
- But if she actually went to Laura
- 4 Johnson, Stephanie Brumley, they'd probably still
- 5 have the track change document?
- 6 A. No. This is the same document that I
- 7 sent them and that the track changes were in and
- 8 then they were all accepted and they're no
- 9 longer -- the documents no longer.
- 10 O. Understood.
- 11 But did you ask Lana Johnson or
- 12 Stephanie Brumley if they have a copy of an email
- 13 with the tracked changed?
- 14 A. No
- 15 Q. I mean, it could have saved it on to
- 16 your system.
- 17 A. It isn't, but no I did not ask them.
- 18 Q. Okay. Then let's change to the next
- 19 document, which is 11. This is SG000815. It is an
- 20 email between you and Mr. McGinley dated January
- 21 18, 2017 in which you say to Evan: This is a final
- 22 closeout report, and Evan says great. Thanks for
- 23 the information.
- 24 What is this about?

- 1 A. No. I mean, I don't know if there was 2 an email and a response back. I don't know.
- 3 Q. Would you have gone ahead with this
- 4 document without his saying that it was okay?
- 5 A. No, I don't think that was -- I don't
- think that was the point.
 - Q. What was the point?
- 8 A. Back then, I don't know what the point
- 9 was. I mean, I provided him depiction of what
- 10 the -- the site.
- 11 Q. Right. But you're asking his blessing
- 12 basically, if this is okay.
- 13 And so I would assume you would have
- 14 waited for his blessing before you proceeded?
 - 15 A. No.
- 16 Q. No? You would have just gone ahead
- 17 without any response from him?
 - A. I don't know if there was a response.
- 19 Q. How did you review your emails in order
- 20 to determine what to produce?
- A. I keep all my emails in a subfolder, and
- 22 I just went back to the date and copied off all
- 23 those emails.
- Q. And what's the subfolder called?

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166

```
Α.
                Johns Manville.
                                                                                   STATE OF ILLINOIS )
                                                                                   COUNTY OF C O O K )
         Ο.
                And do you have any other Johns
     Manville-related emails in any other folders?
                                                                                              I, MARY ANN CASALE, a Notary Public
                                                                                   within and for the County of Cook and State of
         ο.
                Where do you keep all of the hard copy
                                                                                   Illinois and a Certified Shorthand Reporter of said
     documents for Johns Manville?
                                                                                   State, do hereby certify that heretofore, to-wit:
                                                                                              On October 2, 2018, personally appeared
                They're on an external hard drive.
         Α.
                Did you ever print them all out?
                                                                                   before me STEVEN L. GOBELMAN, a witness in a case
                Not print them all out. I printed some
                                                                                   now pending and undetermined in the Before the
     of the photographs off.
                                                                                   Illinois Pollution Control Board wherein Johns
                MS. BRICE: Okay. I think we're done.
11
                                                                              11
                                                                                   Manville is the Complainant and the Illinois
                MR. McGINLEY: No questions.
                                                                                   Department of Transportation is the Respondent.
                                                                              12
                     Signature reserved.
                                                                                            I further certify that the witness was
               FURTHER DEPONENT SAITH NAUGHT.
                                                                                   first duly sworn to testify to the truth, the whole
15
                                                                              15
                                                                                   truth, and nothing but the truth in the cause
                                                                                   aforesaid; that the testimony then given by the
16
                                                                              16
                                                                                   said witness was reported stenographically by me in
17
                                                                              17
18
                                                                                   the presence of said witness, was thereafter
                                                                                   converted to the written English word via
19
                                                                              20
                                                                                   computer-aided transcription, and the foregoing is
20
                                                                              21
                                                                                   a true and complete transcript of the testimony so
21
22
                                                                                   given by said witness as aforesaid; that the
                                                                                   signature of the witness to the foregoing
                                                                                   deposition was not waived.
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                                                                                                     casalereporting.com
                          312.332.7900
                                                                                                        312.332.7900
```

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1
        BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
                                                                                              I further certify that the taking of
                                                                                  this deposition was pursuant to Notice and that
      In The Matter of:
      JOHNS MANVILLE, a Delaware
                                                                                   there were present at the taking of said deposition
                                                                                   the appearances as hereinbefore noted. I further
              Complainant,
                                        (Citizen Suit)
                                                                                   certify that I am not a relative or employee or
         vs.
                                                                                   attorney or counsel, nor a relative or employee of
      ILLINOIS DEPARTMENT OF
                                                                                   such attorney or counsel for any of the parties
      TRANSPORTATION.
                                                                                   hereto, nor interested directly or indirectly in
              Respondent.
              I, STEVEN L. GOBELMAN, state that I have
                                                                                   the outcome of this action.
10
     read the foregoing transcript of the testimony
                                                                              1.0
                                                                                              IN TESTIMONY WHEREOF, I have hereunto
11
     given by me at my deposition on the 2nd day of
                                                                              11
                                                                                   set my hand and affixed my notarial seal this 12th
12
     October, 2018, and that said transcript constitutes
                                                                              12
                                                                                  day of October, 2018.
13
     a true and correct record of the testimony given by
                                                                              1.3
     me at said deposition except as I have so indicated
     on the errata sheets provided herein.
16
                                                                                            MARY ANN CASALE, CSR, RPR, CLVS, CMRS
17
                                                                              17
                            STEVEN L. GOBELMAN
                                                                                            Illinois C.S.R. License No. 084-002668
18
     No corrections (Please initial)
     Number of errata sheets submitted
20
                                                                              20
     SUBSCRIBED AND SWORN to
21
                                                                              21
     before me this ___
22
                                                                              22
                    , 20
2.3
              NOTARY PUBLIC
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170

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EXHIBIT P

Johns Manville vs. Illinois Department of Transportation

No. PCB 14-3

Mike Nguyen

03/20/2019

TRANSCRIPT AND WORD INDEX

CASALE REPORTING SERVICE, INC.

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lo.	PCB 14-3 Elect Edeatroin i		I ,, ((Clear's GHCota 161414/2/0139201	9 3/20/20 ⁻ Page 3
1	BEFORE THE ILLINOIS POLLUT	Page 1	1	INDEX	Page 3
1	BEFORE THE IDDINOIS FORDOT	ION CONTROL BOARD	1	WITNESS	EXAMINATION
	In The Matter of:		_	MIKE NGUYEN	EXAMINATION
_	JOHNS MANVILLE, a Delaware		4	By Ms. Brice	4
5	Corporation,		5		
6	Complainant,	14.2	6		
7	vs.	PCB No. 14-3	7		
8	ILLINOIS DEPARTMENT OF TRANSPORTATION,		8	EXHIBITS	
9	Respondent.))	9	DEPOSITION EXHIBIT	MARKED
10			10	NGUYEN DEPOSITION EXHIBITS	
11	The 206(a)(1) deposition of Illinois		11	No. 1	13
12	Department of Transportation through MIKE NGUYEN,		12	No. 2 No. 3	23 30
L3	called by the Complainant for examination, taken		13	No. 4 No. 5	34 74
14	pursuant to Notice, the provis:	ions of the Illinois	14	No. 6 No. 7	75 76
15	Code of Civil Procedure, and th	ne Rules of the	15	No. 8 No. 9	77 78
	Supreme Court of the State of 3		16	No. 10 No. 11	81 84
	Hahn Peterman, a Certified Shor		17	No. 12 No. 13	85 88
. 8	the State of Illinois, taken at		18	No. 14 No. 15	90 91
-	Building, 2300 South Dirksen Pa	_	19	No. 16 No. 17	92 94
	Illinois, on the 20th day of March, 2019, at 10:30		20		
	a.m.	21011, 2019, at 10.50			
	a.u.		21		
22			22		
23			23		
24			24		
_	Page 2			Page 1 (Deposition commenced at 10:16 a.m.)	
_	APPEARANCES:		1	(Deposition Commenced at 10	10 a.m.)
2			2	MIND MOUNTAIN AND A STATE OF THE STATE OF TH	
3	BRYAN CAVE LLP BY: MS. SUSAN E. BRICE		3	MIKE NGUYEN, produced, sworn	
4	161 North Clark Street Suite 4300	0015	4	on behalf of the Complainant, testific	ed and deposed
5	Chicago, Illinois 60601 tel: 312.602.5000	3315	5	as follows:	
6	fax: 312.602.5050 susan.brice@bryancave.c	com	6	EXAMINATION	
7	on behalf of the (Complainant;		BY MS. BRICE	
8			8	Q. Good morning, Mr. Nguyen. 5	_
9	HON. KWAME RAOUL, Illinois A BY: MR. EVAN J. McGINLEY, A 69 West Washington Stre	Asst. Attorney Genl.		coming today. If you could please state for the record.	ate your name
1	Suite 1800		11	A. My name is Mike Nguyen.	
12	Chicago, Illinois 60602 tel: 312.814.3153 fax: 312.814.2347		12	Q. And your address?	
13	emcginley@atg.state.il.	us	13	A. 4128 Destiny Drive, Springf:	ield, Illinois
14	on behalf of the F	Respondent.		62712.	
15			15	Q. And could you maybe spell th	ne name the
16			16		
17			17		
18				A. Destiny is D-E-N ON, D-E-S-1-1-N-1. Drive is D-R-I-V-E.	
18			19		
20				your deposition taken before?	
21			21	A. No. It's my first time. Q. Okay. So I'll lay out a couple of the	
22			22		TATE OF CITE
23				sort of how this all works	
24			24	A. Okay.	

Mike Nguyen 3/20/2019

Page 7

- Q. -- and some of the ground rules. It's
 pretty simple.
- 3 If you could let me finish asking my
- 4 question before you answer, that would be great. If
- 5 you don't understand a question that I'm asking, you
- 6 can tell me "I don't understand" or ask me to
- 7 rephrase it because it's confusing or something
- 8 along those lines.
- 9 A. Okay.
- 10 Q. If you need to take a break at any point
- 11 in time, let me know. We just can't take a break
- 12 while the question is pending. Okay?
- 13 And the court reporter, you need to be
- 14 able to verbalize. Like, shaking your head, she
- 15 can't write down, so a yes or a no, so it would be
- 16 helpful if you could just verbalize your answers.
- 17 A. Okay.
- 18 Q. Great. Thank you. And you understand
- 19 that you're under oath here and must tell the truth,
- 20 correct?
- 21 A. Yes. Correct.
- Q. Could you give me a description of your
- 23 employment history?
- 24 A. I work at Andrews after I graduate from

Page 6

- 1 Robert Morris College, been there over 17 years, so
- 2 most of my duties is drafting figures for the
- 3 project managers.
- 4 Q. And what degree did you get at Rock Morris
- 5 College?
- A. Associate degree, two years.
- Q. And what particular area? Like, was there
- 8 something you were studying, like, you know, an
- 9 architecture degree or an engineering degree?
- 10 A. It's multiple. They taught us multiple
- 11 discipline. I am mechanical, architectural, civil,
- 12 so...
- 13 Q. Sorry. Go ahead.
- 14 A. So, yeah. When you apply, for example,
- 15 Andrews, so they have several disciplines, so...
- [6 Q. So did you get your degree in
- 17 civil engineering?
- 18 A. No. It's just the -- it's just pretty
- 19 much the degree combined with the multiple
- 20 disciplines.
- 21 Q. Okay.
- 22 A. Mechanical, architectural.
- Q. Understood. What's that degree called?
- 24 A. Actually, I can't remember. It's art

- 1 and -- Art in Associate's. I don't know. I can't
- 2 remember. You can call Robert Morris and contact
- 3 them.

4

- O. Right. And it's Robert Morris?
- 5 A. Robert Morris. Now it's university. Back
- 6 then it was college.
 - Q. And was that here in Springfield?
- 8 A. Yes.
- 9 Q. And you've been working for Andrews, I
- 10 think you said, for 17 years?
- 11 A. Yes.
- 12 Q. And has your position changed over time?
- 13 A. Yes.
- 14 Q. Okay. Could you explain that to me a
- 15 little bit?
- 16 A. I went from a CAD Technician I to CAD
- 17 Technician II to III. I'm currently now a CAD
- 18 manager.

21

- 19 Q. You're a CAD manager?
- 20 A. Yes.
 - Q. Okay. What does a CAD Technician I do?
- 22 A. Basically, just drafting, produce figures
- 23 for project manager, for example, like a basemap,
- 24 draws site plans, just to produce figures instructed

Page 8

- 1 by project manager.
- Q. Okay. So is a CAD technician -- you then
- 3 went to CAD Technician II and then CAD Technician
- 4 III and now you're a manager. What's the
- 5 difference? Like, what do you now that's different
- 6 than what you did as a CAD Technician I?
- A. It's pretty much not much, except for the
- 8 manager, now they have to do more, like
- 9 customization on the software and troubleshooting,
- 10 helping the lower junior CAD on a certain problem,
- 11 like how to operate the software.
- 12 Q. Okay. So generally it's the same job
- 13 except you have some managerial responsibilities?
- 14 A. Correct. Correct.
- 15 Q. Do you have to get a license or a
- 16 certification to work with CAD?
- 17 A. I understand you have to have the degree,
- 18 at least two years.
- 19 Q. Okay. You have to go to school for two
- 20 years?
- 21 A. Right.
 - Q. And get a degree and that encompasses CAD?
- 23 I don't know how this works.
- 24 A. Yeah. That's how I understand. I don't

Page 9

Mike Nguyen 3/20/2019

Page 11

- 1 know. Maybe a different company might require less
- 2 requirements, just like a high school.
- Right. But is there, like, a specific
- 4 test or something you take to be able to do CAD? Is
- 5 there a CAD certification?
- They do have it, but my company does not
- really require to have a certification.
- So do you have a CAD certification?
- 9 No, I don't.
- Okay. And do you have a CAD license? 10
- No, I don't. No, it's not really a CAD 11
- 12 license.
- Ο. Okay. So is there anything else that sort
- 14 of exists as far as certifications, licenses, or
- 15 something like that for people who do CAD?
- No. Just go to school and get familiar 16
- 17 with how to operate software.

1 General's Office, correct?

Correct.

- And what does it take to get a CAD Q.
- 19 certification?
- 2.0 I'm guessing you have to take, like, an
- 21 exam test or something to get a certification, but
- 22 that's pretty much about the school. You've got to
- 23 go to -- I mean...

Α.

Today you're represented by the Attorney 24 Q.

And how did you learn that we wanted to

Page 10

- 1 answer, and just be calm.
- Yeah. And what do you mean by how to

8

- 4 take your deposition?
 - From Evan. He called me, so that's how I
- 6 knew.
- Q. Okay. Are you being paid for your
- 8 deposition today?
- Α. I don't know nothing about that one, so --
- 10 hopefully.
- And when Evan called you, what did he tell
- 12 you?
- That I have the deposition for the case of Α. 13
- 14 Johns Manville case.
- 15 Ο. And did you talk to Mr. Gobelman about
- 16 that?
- 17 No.
- 18 Did he tell you not to talk to
- 19 Mr. Gobelman about it?
- Who? 20 Α.
- 21 Ο. Anybody.
- No, just Evan. Keep it, like, low key,
- 23 not to talk to anybody about this stuff.
- So don't talk to Mr. Gobelman about it? 24

- Right.
- Were you told you could hire your own Q.
- 3 lawver?
- 4 Α. No.
- Q. What did you do today to prepare for your
- 6 deposition?
 - Prepare? Just what normally I do, just
- 8 eat breakfast and -- I don't know.
- 9 Did you look at any documents?
- Oh, yes. Yes, I'm sorry. Α. 10
- That's where I'm going. Ο. 11
 - Α. I don't know what I'm supposed to say.
- Q. No worries. It was an open question, so I
- 14 apologize.

12

21

- 15 So what specifically did you do to get
- 16 ready to take this deposition today or to be
- 17 involved in this deposition? Did you meet with
- 18 Mr. McGinley?
- Α. Yes. We met yesterday.
- 2.0 Okay. And how long did you meet for?
 - Α. Two hours.
- Okay. And what did you -- what did you Ο. 2.2
- 23 talk about?
- Α. About this case, went through how to
 - Page 12
- Ο.
- 3 answer?
- Just answer what I know. If I don't know,
- 5 say I don't know. If I know, answer. Speak loudly
- 6 so she can record correctly.
- Did you -- what documents did you look at? 7 Ο.
 - The -- I forget. It's the -- that notice. Α.
- Yeah. This document? 9
- Yes, the notice.
- I'll mark it in a minute.
- Right. 12
- Notice of Deposition? 13 Ο.
- Α. Right. 14
- Did you look at any other documents, any
- 16 maps or figures that you had done?
- Yes. He showed me the previous figures 17 Α.
- 18 that I'd done.
- And what do you mean by "previous Ο.
- 20 figures?"
- Α. The previous just means the one that I
- 22 have done.
- 23 Q. The ones that you've done throughout the
- 24 course of this matter?

Page 13 Page 15 1 Α. Right. 1 deals with this Johns Manville site and the figures 2 where you guys would all go put your stuff on the S Okay. Were there any that sort of you 3 paid more attention to than others? 3 drive for Mr. Gobelman, right? Α. Α. Yes. Did you read any deposition transcripts Ο. What's in that S drive? 5 Q. 6 from Mr. Gobelman's deposition? All the files associated to the project. Just a little bit, yes. Pretty much she Were all the different versions of the 7 drawings in those files? 8 recorded word by word, so... 9 Ο. So you read his deposition transcripts? 9 Yes. Yeah. In the folder. In the S drive? 10 Α. Ο. 10 Yeah, folder. And who told you to do that? Α. 11 Ο. 11 Okay. So if I were to want to see all of 12 Α. Mr. Evans showed me the transcript. 12 Ο. Ο. Okay. Did he tell you why? 13 those, what would I -- what would I do? I'd go into 13 Just an example what it looks like, what 14 the computer system and I'd just put the S drive in 14 15 it looks like. 15 the link and then I could access all of that? Is 16 that how that works? MS. BRICE: Okay. We're going to mark 16 17 this as Deposition Exhibit 1. Α. No. It's assigned by the letter. The S 18 is, like, S, J, or whatever, for that drive, and (Nguyen Deposition Exhibit Number 1 18 19 then you have the project folder for the project 19 was marked for identification.) 20 BY MS. BRICE: 20 name. You click on that and then there's a whole 21 bunch of folders, subfolders, that contains all the 21 Ο. So, Mr. Nguyen, I've placed before you 22 what we've marked Deposition Exhibit 1, the Notice 22 files associated with that project. 23 of Deposition of Mike Nguyen, and we were just Right. And so anything you would have 24 talking about this document, and I think you said 24 done would be put in that file? Page 16 Page 14 1 that you went over this document with Mr. McGinley, Right. 1 Α. 2 is that correct? And it stays there. Ο. 2 Α. Correct. 3 Α. Yes. Q. And when did you first see this document? Q. How about Mr. Gobelman's reports that he's A week ago. Mr. Evan e-mailed it to me. 5 done for this case? Are those also in that folder? And as you know, there's a lot of -- if 6 Α. 7 you turn to page 8, it requests a number of Are there multiple drafts of those reports Ο. 8 in that folder? 8 documents, right? 9 Α. Yes. Α. Yes. They should be in there. 10 Okay. And did you personally look for Q. Have you seen the drafts of the report in 11 the folder? 11 these documents? Personally look it over? No, not A. No. I don't look at reports. My job 12 13 personally look it over again. 13 mostly deals with drawings. Okay. Who looked for the documents that I understand. Not that you would have 14 15 you produced? 15 read it, but did you see that there were drafts of Oh, it's our IT person. 16 the reports in there? And what did you tell the IT person? 17 17 Α. Yes. I didn't tell him nothing. Α. Q. Do you keep notes? 18 18 Okay. No. I'm sorry. Ο. 19 Α. 19 It was from the upper management. That's okay. Do you keep notes when 20 Α. 20 Ο. So you weren't involved at all in going 21 you're working on a project?

Q. I understand that there's an S drive that 24 supposed to do on a given project?

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22 through your e-mails?

23

24

23

Α.

No, I don't.

Okay. So how do you know what you're

Mike Nguyen 3/20/2019 Page 19

Page 17

- A. Honestly, I've been doing this long
- 2 enough, if the project manager says, okay, I need a
- 3 basemap, aerial map, something, I pretty much know
- 4 exactly what they want.
- ${\tt Q.}$ ${\tt Q.}$ Okay. Do they e-mail you, or do they call
- 6 you, or do you meet? Like, how does that work?
- A. Most of the time e-mail, most of the time.
- 8 Call me. It just depends on the days. Maybe they
- 9 like to walk around, saw me and assign me.
- 10 Q. Understood. Do you still have all your
- 11 e-mails that you received relating to this project
- 12 somewhere in your e-mails? Do you have, like, a
- 13 folder where you save your e-mails relating to
- 14 projects?
- 15 A. All the e-mail stuff is in the e-mail, so
- 16 the IT, whatever, is on my inbox e-mail, whatever it
- 17 is.
- 18 Q. Did you delete any e-mails relating to
- 19 this --
- 20 A. No.
- 21 Q. -- matter?
- 22 A. No. No.
- Q. Okay. I'm going to ask you just a couple
- 24 general questions about CAD because I've played

Page 18

- 1 around with it, but I don't know how it really fully
- 2 works. So if you could just give me a little
- ${\tt 3}$ background on what are the different things that you
- 4 can input into CAD to create a basemap.
- 5 MR. McGINLEY: Objection. Vague and
- 6 ambiguous.
- 7 BY MS. BRICE:
- 8 Q. Do you understand the question?
- 9 A. Like an xref? An xref, that means like an
- 10 image, PDF, Word document.
- 11 Q. And then how do you -- it's my
- 12 understanding that the State Plane Coordinate -- do
- 13 you know what a State Plane Coordinate is?
- 14 A. No. Oh, the State Plane Coordinates.
- 15 Q. Yes.
- 6 A. Yes, I do. Sorry. You kind of --
- 17 Q. Sorry. I apologize. What is a State
- 18 Plane Coordinate?
- 19 A. It's the coordinate system especially for
- 20 surveying purposes, like GPS.
- Q. Surveying. Surveying purposes?
- 22 A. Yes.
- Q. And is that in CAD or do you have to put
- 24 it into CAD?

- A. Well, you have to have it assigned because
- 2 if -- you have two State Plane Coordinates, one
- 3 west, one east, so it depends on what project you're
- 4 working on. You need to know what coordinate --
- 5 what State Plane Coordinate it's in.
- 6 Q. Understood. So let's just take this
- 7 matter, you know, at this site, the Johns Manville
- 8 site in Waukegan. Do you know what I'm talking
- 9 about?
- 10 A. Yes.
- 11 Q. How did you determine the right State
- 12 Plane Coordinates for the Johns Manville Site 3 and
- 13 Site 6?
- MR. McGINLEY: Objection. Assumes facts
- 15 not in evidence.
- 16 THE WITNESS: Well, I looked at the city,
- 17 the county, so whatever belongs to what state, the
- 18 State Plane Coordinates, and that's how I determine.
- 19 BY MS. BRICE:
- Q. Okay. But is there a book or is there
- 21 something that populates on CAD?
- 22 A. There's a map on the IDOT website.
- Q. Okay. So you go to the IDOT website, and
- 24 what does that tell you?

- 1 A. It shows me the county and then the one
- 2 zone, two zone, and then there's what you call an
- 3 IDOT district that's on there.
- 4 Q. Okay. And so you manually put in the
- 5 State Plane Coordinates? You type them in somehow
- 6 into the CAD? Is that how that works?
- 7 MR. McGINLEY: Objection. It mistakes the
- 8 witness's testimony.
- 9 MS. BRICE: I'm confused.
- 10 BY MS. BRICE:
- 11 Q. Seriously, I'm not trying to misstate your
- 12 testimony. I'm just trying to understand how the
- 13 State Plane Coordinates are where they are within
- 14 the CAD system. I mean, do you have to push a
- 15 button and it pops up, or do you have to go in and
- 16 say, This is where I am. This is the State Plane
- 17 Coordinate.
- 8 A. Yes. The program provides all the
- 19 coordinate systems. The user has to select the
- 20 coordinates, which one's which. The program cannot
- 21 determine.
- Q. Okay. So what's the program that you use?
- 23 A. Civil 3D.
- 24 Q. Civil 3D?

Mike Nguyen 3/20/2019 Page 23

Page 21

A. Correct.

- Q. C-I-V-I-L? Okay. So you're using that
- 3 program to create a map and then you determine off
- 4 of the IDOT records the State Plane Coordinates, and
- 5 then you put those in there, is that right?
- 6 A. Right.
- 7 Q. Okay. Great. Thank you. That's very
- 8 helpful.

1

- 9 When did you first become involved in what
- 10 we're talking about? And what I'm referring to is
- 11 this JM project Mr. Gobelman was working on.
- 12 A. Like, what do you mean? Like...
- 13 Q. When was the first time you did anything
- 14 for Mr. Gobelman with respect to this project?
- 15 A. Like, a year or two ago.
- 16 Q. And what did you do?
- 17 A. Mostly assist him on CAD, what he needs to
- 18 do the display show on the figures.
- 19 Q. And when you say a year or two ago, so
- 20 you're talking about, like, 2017, '16, something
- 21 like that?
- 22 A. Yeah, something about that. Yes.
- Q. Okay. And do you remember exactly what
- 24 you were working on at that point in time?
 - Page 22

- 1 A. No.
- 2 Q. Were you working on maybe exhibits for his
- 3 testimony that he was going to give in the first
- 4 part of this hearing?
- 5 MR. McGINLEY: Objection. Assumes facts
- 6 not in evidence.
- 7 BY MS. BRICE:
- 8 Q. I'm just asking.
- 9 A. I don't know what he worked on. He just
- 10 gave me and instructed me what he needed to be
- 11 showing on the figures.
- 12 Q. Okay. All right. We'll go through the
- 13 figures, and then if there's any other figures you
- 14 remember working on that I don't have, then we can
- 15 talk about that.
- 16 How did you become involved? Like, did he
- 17 just come up to you and say, hey, you know?
- 18 A. Yes.
- 19 Q. Okay. And what did he say?
- 20 A. Work on the figures.
- ${\tt Q.}$ Okay. What did he tell you about the
- 22 project?
- 23 A. It's not really what -- like, my job as a
- 24 project manager, it's not like every time we have a

- 1 project, we have to sit, like, five, ten hours,
- 2 describe what it is. It's just every day I have
- 3 either an e-mail or someone comes to me, says, Here,
- 4 create a basemap here. Create a sign map here. Do
- 5 this, do that. So I am not really in details of, I
- 6 mean, the project, what -- you know.
- 7 Q. So you didn't have an understanding of
- 8 what the project was about?
- 9 A. No.
- 10 Q. Okay. The more recent maps that you've
- 11 worked on with Mr. Gobelman, did you have any
- 12 understanding that these related to damages in the
- 13 case that he's working on?
- 14 A. No.
- 15 MS. BRICE: I'm going to mark this as
- 16 Deposition Exhibit 2.
- 17 (Nguyen Deposition Exhibit Number 2
- 18 was marked for identification.)
- 19 BY MS. BRICE:
- 20 Q. I've handed you Deposition Exhibit
- 21 Number 2, which is Expert Rebuttal Report of Steven
- 22 Gobelman on Damages Attributable to IDOT, Based on
- 23 IPCB Order of December 15, 2016. Have you seen this
- 24 document before?

- 1 A. No
 - Q. Okay. If you can turn to -- and it's sort
- 3 of, like, halfway through there's a basemap. And
- 4 I'm sorry. There's not numbers on this document.
 - A. What figure are you on?
- 6 Q. So it's Figure 1.
- 7 A. Okav.
- Q. Okay. Were you involved in creating this
- 9 map?
- 10 A. Yes.
- 11 Q. Okay. And what did you understand the
- 12 purpose of this map to be?
- 13 A. I don't -- pretty much, I mean, tell me to
- 14 put the image, show the image, so what's needed to
- 15 be shown on the figure. I really don't know what
- 16 the purpose of what --
- Q. Okay. And what did you do to put this
- 18 document together or this Gobelman Figure 1?
- A. Mostly based on the PDF files that he sent
- 20 me.
- Q. Can you walk me through it, sort of how
- 22 you created this basemap?
- A. Okay. First, you open the software, know
- 24 what the location's at, get the image, put our

Page 25 Page 27 1 border on, and then, I mean, notes, scale, arrow. 1 you're trying to create an accurate map. 2 Just a basic site map. Correct. Α. Q. What documents did you look at to put this 3 Okay. So is there any kind of book or 4 together? 4 treatise or something that talks about, you know, It's a PDF that he sent me. 5 how -- what kind of sources you use to create an Okay. And so he told you which documents 6 accurate map --Q. 7 to use? Α. No. Yes. Q. -- that you're aware of? 8 Okay. Did you know that there were other 9 Α. 10 maps out there that could have been used instead of Okay. And, in your mind, if you wanted to Ο. 10 11 the ones that he gave you? 11 create an accurate map, what kind of sources would No. Whatever he e-mailed me, I used. 12 12 be you be relying on? 13 Okay. How did you communicate with Well, for example, in an aerial map, we 14 Mr. Gobelman with respect to creating all of these 14 try to get the latest and greatest aerial, and a 15 various maps? 15 note has to be on there, and the scale has to be E-mail, talking to him. 16 required to be on there. No other aerial -- no 16 Okay. Just e-mail or did you have phone 17 17 aerial need to be on there. I mean, it has to be 18 conversations, too? 18 accurate, and so --For noting scale, I mean, image, the 19 Yeah, phone. When he come by, yeah, we 20 talked, too. 20 gridlines show -- to me, that's accurate as can be, 21 Ο. Okay. Was it mainly e-mail? 21 I mean, when a person looks at it, but don't jam, Yes. 22 like, so much stuff in one figure. Does that answer 2.2 Α. I take it from what you're saying that it 23 your question? 24 was Mr. Gobelman's idea to create this basemap, is Q. Sort of. It's okav. Page 28 Page 26 1 that right? You are creating a basemap using a bunch 2 of different sources, right? Α. Yes. And is this the first map that you did for Right. 3 Α. 4 Mr. Gobelman on this project? And it's dated here Which here, you know, it says -- you know, 5 August 2018, which I'm not sure why, but... 5 on the notes you talk about different sources, Yes. I'm guessing. 6 right? Okay. But you said you'd been working Α. Right. 8 with him for the last two years, so that's why I'm Do those sources have to be consistent Ο. 9 confused. 9 with each other in order for everything to line up? 10 Α. Well, maybe the map before and then we The source, it just pretty much will 11 update the date. 11 remind you where the source comes from. Okay. When creating a basemap, what types Q. I understand. But you have your aerial 12 12 13 of sources are appropriate to use in your mind, in 13 map, right? 14 your professional opinion? Α. Right. 14 15 What do you mean? 15 Ο. And then you're laying on top of that --Like, what's -- is it okay to use a draft Α. Right. 17 of something to create a basemap? -- another document, right, that shows 17 18 perhaps the outline of Site 3? 18 A. Well, again... Q. A draft document? Right. 19 19 Α. Like, again, on the figure, whatever the And then you're laying on that a document 2.0 21 that shows you where the boring locations are, 21 project manager provides to me what to use, I'm 22 using. I don't have, like, saying, No, don't use 22 right? 23 this, don't use that. 23 Right. Do you have an opinion as -- I imagine Q. And then you're laying on top of that a 24 24

No. PCB 14-3 Elect Elect to thick thing Received, Cleck's Official icte 10/2/0139/2019

Page 29 Page 31 1 document that shows you where the utilities are or 1 is different than -- these two maps are different 2 something like that, right? Do those documents need 2 from each other, right? 3 to be consistent with each other in order for the It's just the image. It's just the 4 map to be accurate? 4 updated image. You mean line up? Ο. The only difference is the updated image? Yeah. Oh, just the layout and then -- oh, just Q. Yes. It has to be lined up, yes, the property lines. The site line is different, 8 consistent. adjustment. 9 Ο. Who else was involved in the creation of Right. And so why did you adjust the 10 property lines? 10 this basemap? You mean for the drafter, the technician? No, not me. It's because Mr. Steve had 11 Α. 12 some different source that -- the discrepancy is 12 Q. Yeah. Α. Just me. 13 different than the first one to the date and the 13 Just you. 14 file that he gave me, so that's why. 14 Q. 15 Α. Yeah. So he said -- tell me if I'm saying this Okay. And did Mr. Gobelman work on it 16 right. He said, We need to update this with this 16 Ο. 17 with you or just send you stuff and say "put this 17 source --18 together?" Right. 18 A. -- instead of the other source. 19 Α. For the drafting, that's my job. 2.0 Understood. 20 His job is to provide me what he wants to Were you involved at all in looking at the 21 21 22 show. 22 sources, or was it him saying, this is the source to 23 use because there's a mistake. 23 Okay. If you wouldn't mind keeping that, 24 just keep that open to Gobelman Figure 1, if you I don't know if it's a mistake or not. He Page 32 Page 30 1 wouldn't mind, and I'm going to mark this as 1 just e-mailed to me and said, This is the file to 2 Deposition Exhibit 3. Have you seen this document 2 use. 3 before? And he said, We need to do a new map? 3 (Nguyen Deposition Exhibit Number 3 Correct, a new map. An updated map, was marked for identification.) 5 5 pretty much. No, not this one either. An updated map. Okay. And that changed 6 Α. Okay. And for the record, this is Expert 7 the -- that made certain changes based upon -- what 8 Rebuttal Supplemental Report of Steven Gobelman on 8 was the new source that he gave you? 9 Damages Attributable to IDOT, Based on IPCB Order of I don't remember. It's a PDF. Α. 10 December 15, 2016, and it's dated November 7, 2018. Yeah. Let me ask you, was it -- here at Okay. So if you wouldn't mind, we're 11 the end of the Supplemental Report, Appendix C, 11 12 going to do something similar here and find the 12 there's a Grant for Public Highway and a 13 basemap in this one, which I believe is -- there's a 13 description. 14 Gobelman Figure 1 on this one, right? Yeah. You have to show me so I can Α. 15 Α. Yes. 15 remember. There's a map or something, a flat map. Okay. Did you put -- did you put this map There's a map at the very end, so turn to 17 together, the Gobelman Figure 1 on the Supplemental 17 the last page if you wouldn't mind. 18 Report? You have the bearing and distance. Yes, Α. Yes. 19 that's it. That's the bearing and distance. 19 All right. So this is what he said, "Take And why was it created? 20 Ο. 21 Α. 21 this. We need to update the map using this here," Why created? 22 Ο. Uh-huh. 22 is that correct? 23 It was already created from the first one. 23 Yes. Yes. Right. But why? Why did you -- this map

24

24

Q.

And do you recall what you had used the

- 1 first time around for the -- in the initial Gobelman
- 2 Figure 1 what you used for the -- for the --
- This one?
- Yeah, for the site lines. Ο.
- It has to be another map.
- Well, look over at the notes. See if that Q.
- 7 helps you.
- So site location from aerial. So which
- 9 one are you talking about? On the image? The
- 10 lines? What?
- I'm talking about the line. You said that
- 12 the line -- the line on the north part of Site 3,
- 13 right?
- Right. 14
- 15 Q. The northern line, the northern boundary
- 16 of Site 3 changed between these two maps, right?
- 17 Α. Right.
- Okay. I'm trying to understand what you 18 Q.
- 19 used as the source the first time that you did the
- 20 map.

1 boundary.

Α.

Q.

6 pretty much that.

Yeah.

All right.

2

8

- 21 Α. Well, I can't remember. It has to be in
- 22 another file, I mean, so I overlay it.
- Okay. But these notes here don't help you
- 24 at all figure out where you got that northern

For these notes down here?

5 6 location derived from the IDOT right-of-way, so

- Page 34
- 1
- Ο. Yeah. How is it different; do you know?
- The image. How the layout is different. 3 Α.
- 5 anything else as you sit here today that you can
- Q. That doesn't reference the site boundary.

Yeah. It's the image, and that's the Site

- 9 Ο. Yeah. It doesn't reference it, does it?
- 10
- Okay. If you would -- I'll give you one 11
- 12 more document.
- MS. BRICE: Mark this as Deposition 13
- 14 Exhibit 4.
- 15 (Nguyen Deposition Exhibit Number 4
- was marked for identification.) 16
- 17 BY MS. BRICE:
- So I'm giving you what's been marked as 18
- 19 Deposition Exhibit 4, Expert Report of Douglas G.
- 20 Dorgan, Jr., on Damages Attributable to IDOT,
- 21 June 13, 2018. Have you seen this before?
- 22 Α. No.
- Okay. Take a look at where the pink tab 23
- 24 is and there's a map there.

- Okay.
- Have you ever seen this map before? 2
- 3
- Okay. And in what context did you see Ο.
- 5 this map?
- From the PDF file, Mr. Gobelman's e-mail 6 Α.
- 7 to me.

- Okay. So he had you -- this was one --8
- 9 this was a source document for some of your maps?
- Α. Yes. 10
- Ο. Okav. 11
- Α. I think there's one figure -- they had,
- 13 like, three different site boundary differences on
- 14 figures. There's a discrepancy on the site
- 15 boundary. I think we show -- one figure shows that.
- I'll get to that. I know what you're 16
- 17 talking about.
 - All right. Α.
- I just want to stick to this figure for Q.
- 20 right now.
 - Α. Oh, sorry.
- That's okay. And it's Figure 1 of Ο.
- 23 Exhibit 4. Do you know how your basemap in the
- 24 initial report is different from this Figure 1?
 - Page 36
 - How? Α.
- Okay. Other than the image, is there
- 6 recall?
- Well, this one's got so much stuff on here
- 8 that -- the figures that I create are a little bit
- 9 less fine features.
- Q. Sure.
- It's just the figures I create. It's just
- 12 what is instructed by the project manager.
- Okav. 13 Ο.
- Α. I mean, I'm not deciding which to show on 14
- 15 the figures.
- Q. Got it. If you can turn back to
- 17 Exhibit 2, which is the Initial Expert Rebuttal
- 18 Report of Steven Gobelman, and then let's go back to
- 19 the end here, and I'm sorry it's not marked, but
- 20 it's here -- it's probably ten pages from the end --
- 21 and what I'm looking at is a document that says
- 22 Figure 15, Soil Boring Location Map, Site 3,
- 23 JM 000565.
- There you go, yeah. Okay. Is this the 24

- 1 map you used to plot the borings on your figures?
- 2 A. Boring. It doesn't look like I created
- 3 any borings on that.
- Q. Okay. Well, go back to your -- you know,
- 5 Gobelman Exhibit 1, right?
- 6 MR. McGINLEY: And which report?
- 7 MS. BRICE: Let's use the same one just
- 8 for these purposes.
- 9 And why don't we mark that so it's easier
- 10 for you to flip back and forth.
- 11 THE WITNESS: Okay. Which one?
- 12 BY MS. BRICE:
- 13 Q. Gobelman Figure 1, and this is in
- 14 Exhibit 2.
- 15 A. Exhibit 2. Okay.
- 16 Q. Yeah. Okay. You see how there's borings,
- 17 like B-326, B-325, B-316, B-315, up there in the
- 18 northern portion of Site 3?
- 19 A. Yeah.
- 20 Q. Okay. And then there's some other ones --
- 21 there's more. There's a group of them and then
- 22 there's some above that: 1S, 2S, 3S, 4S. Do you
- 23 see that?
- 24 A. Yes.

Page 38

- Q. Are these boring locations? Is that what
- 2 you're depicting?
- 3 A. Yes.
- 4 Q. What did you use as the source for those
- 5 boring locations?
- A. I mean, from the data from Mr. Gobelman.
- 7 Q. Okay. So Mr. Gobelman gave you something.
- 8 Mr. Gobelman told me that he gave you this, okay?
- 9 I'm not trying to be tricky. That's why I'm just
- 10 trying to understand.
- 11 A. Well, he had to give me something. I
- 12 can't just pop -- I mean, I can't just stick in the
- 13 figures.
- Q. Okay. So do you remember seeing this map,
- 15 which is JM 000565?
- 16 A. I don't know. I can't remember. We've
- 17 got a whole bunch of different sources. There's,
- 18 like, three or four, like, one to two years ago.
- 19 You're asking me all these to the point of real
- 20 detail. The exact figures I can't remember.
- Q. Okay. So you don't remember if this is
- 22 the map that you used?
- 23 A. No. I don't remember.
- Q. Okay. That's all right. That's fine.

- Let's assume, for the sake of argument,
- 2 that this is the map that you used.
- 3 A. Okay.
- 4 Q. How would you have used this document, you
- 5 know, if we just have this -- it's kind of a rough
- 6 document.
 - A. So if I'm using this -- I mean, it's a
- 8 PDF. All you just do is overlay and match pretty
- 9 much the site boundary because that's the only way
- 10 you can go for to line up. I mean, what else can I
- 11 line up? You just have to use that site boundary.
- 12 Q. Okay.
- 13 A. But, again, I've got to go back. Like,
- 14 the source, sometimes the site boundary is
- 15 different.
- 16 Q. Right. And this doesn't have State Plane
- 17 Coordinates on it, does it?
- 8 A. Man, I can't -- yeah. This one, there's
- 19 no grid, no grid system, no notes. I can't tell.
- 20 Q. Right. So would it be hard to use this
- 21 document to plot the exact location of these
- 22 borings?

5

8

- 23 A. The exact, no.
 - Q. Sorry. I don't understand.

- 1 A. Exactly to the boring location, then, no.
 - Q. No, meaning what? It would be hard to do
- 3 that or it wouldn't be hard to do that?
- 4 A. No, it wouldn't be hard.
 - Q. It wouldn't be hard.
- 6 A. No. But you say exact. You cannot be
- 7 exact to the --
 - Q. Why can't you be exact?
- 9 A. Well, it's because -- I mean, you work
- 10 from the PDF file, you know what I mean? Like I
- 11 said, there's some differences on the site, so
- 12 you've got to be the best match. That's the word I
- 13 would use.
- 14 Q. Right. But if you had State Plane
- 15 Coordinates here, it would be easier to make the
- 16 matches to match. Is that correct, or no?
- 17 A. No. If you've got enough data or not --
- 18 you cannot say it's a State Plane, State Plane, you
- 19 know what I mean? You've got to show at least what
- 20 data and show the grid, show the -- what do you call
- 21 it? You have some kind of reference. I mean, show
- 22 me more accurate.
- Q. Okay. Would something that had more
- 24 information on it with the grid, etc., things that

Page 41 Page 43 1 you're talking about, be a better source document 1 lithology layers, so whatever the boring 2 than this one to use to plot the borings? Size? MR. McGINLEY: Objection. Lacks Yes. You know, I mean, the more you give 4 me, the better, but the basics has to be the north 4 foundation. Vague and ambiguous. THE WITNESS: I mean, I don't know. 5 and east. That's where the location is at so I 6 BY MS. BRICE: 6 know. And when you say the north and east, are Q. Well --8 you talking about the north and east of the borings Okay. I'm confused. Can we rephrase the Α. 9 themselves or of the site outline? 9 question? Yes, we can rephrase. It seems to me that The borings themselves. 10 Ο. 10 11 this is a pretty basic map and it doesn't have a lot The borings themselves. Okay. 11 And I take it you didn't -- I know this is 12 of information on it, is that right? 13 Well, it depends on what map you want to 13 difficult. Let me back up. 14 look at, though. It doesn't always need to show, I Mr. Gobelman said this was the map that 15 mean, like everything. Sometimes the more 15 you guys used. If that's the case, do you recall 16 information is not good. Sometimes less is not 16 going back and saying, Is there a better map that 17 good. It's --17 has more information? Would you have done that? Yes. If you've got a better map, yes, you 18 Q. Okav. 19 have to tell them. It's what you want to show for the figure. 20 That's why you've got a whole bunch of figures, you Okay. And do you remember having any kind 21 know what I mean? Like, one figure, boring only; 21 of conversation like that with Mr. Gobelman? 22 one figure, utility lines; one figure, just a basic No, I don't. It's been a while. Do you 23 plain site map. 23 know how many projects I've been doing for each Q. Okay. If you want to accurately -- just 24 year? You're telling me to go back, like, a year or 24 Page 42 Page 44 1 set this aside for right now. 1 two at this level of detail, like, specifically this If you want to accurately plot borings, 2 figure? Heck, I can't remember. 3 right, on a basemap that you're creating --Okay. Let's go back to Figure 1 and I'm Right. 4 going to go this time ---- what kind of source document do you MR. McGINLEY: Which... 6 want and what information do you want on it? MS. BRICE: I know. I'm going to tell 6 Well, first of all, there has to be a 7 you. 8 north and east in there, so I know that north and 8 BY MS. BRICE: 9 east line up. That's the first thing. Figure 1 in Exhibit 2. 9 Ο. Okay. And this map here, JM 000565, does 10 Α. Okay. Figure 1. 11 not have that, right? Okay. So I just want to understand. To It just have the -- what do you call it? 12 place the borings, did you measure anything or did 12 13 The ID of the boring. That's it. 13 you just overlay the map, the map that Mr. Gobelman Right. But it doesn't have the north and 14 14 gave you? 15 east. Α. Again, I don't remember. I mean, is it Right. 16 from that map or is it from the measurement? A. Okay. What else would you want to create Okay. What do you think you would have 18 an accurate -- to accurately plot the borings? 18 done? I mean, you know, if you overlay the map, do The north and east -- the north and east 19 you typically try and measure to determine that the 19 20 thing. That's the first thing I need. That's for 20 boring is in the right place if you don't have 21 the grids. 21 south, north and east? Okay. What's the second thing you need? 22 22 MR. McGINLEY: Objection. Lacks 23 The ID, the elevation, the lithology. I 23 foundation. mean, what is it? The clays, the sand, the THE WITNESS: I'm not out in the field. 24

1 don't know where the boring location is at.

2 BY MS. BRICE:

Q. Okay. So you don't know if you did any

4 measurements here to determine where to place these

5 borings, is that correct?

6 MR. McGINLEY: Objection. Asked and

7 answered.

8 THE WITNESS: Yes. You need to if you

9 know the measurement from each spot.

10 BY MS. BRICE:

Q. Right. That's what I'm just asking is,

12 did you measure? Do you know if you measured or

13 not?

14 A. Like I say, I can't remember.

15 Q. Okay. And I take it that this one --

16 let's go to -- actually, this is Exhibit 2, but it

17 doesn't matter. They're basically the same. So

18 let's do the same. Let's just ask the same set of

19 questions.

20 So that was Exhibit 3 that we were just

21 talking about, and I asked you if you measured and

22 you said you didn't remember if you measured or not.

23 The same question for Exhibit 2. I'm

24 assuming it's the same answer, that you don't know.

Page 46

A. Yeah. I don't remember.

Q. Okay. That's totally fine if you don't

3 remember.

4 Do you know if these boring locations

5 align with the boring locations that were submitted

6 to USEPA by the consultant that was working on the

7 project?

MR. McGINLEY: Objection. Compound, lacks

9 foundation, assumes facts not in evidence.

10 BY MS. BRICE:

Q. Let me ask again. Did you know there was

12 a consultant working on this project?

A. I don't know.

Q. Well, somebody did some borings, right?

15 A. Yes. Yeah.

Q. Did you know there were other reports that

17 showed boring locations?

18 A. I don't know.

Q. You did not know that?

20 A. No.

21 Q. Okay.

A. My main job is just to draft the drawing.

23 All the gathering information, that's not my job.

Q. Okay. Do you know -- and I think I know

1 the answer to this but I just need to get an answer

2 to the question. Did you know how big those borings

3 were that are depicted on your maps on your Gobelman

4 Figure 1's?

A. How big. What do you mean, how big?

Q. How big of a -- was it a -- the kind of

7 boring it was, was it a trench? Was it just a small

8 three-inch boring? Do you know?

A. No. I don't know what kind it is.

10 Q. Did you know how deep they were?

11 A. No, I don't.

12 Q. Okay. Would that have been helpful

13 information?

14 A. For what, the boring sizes and stuff?

Q. For creating -- for trying to create an

16 accurate basemap.

17 A. The boring size, it really doesn't matter

18 on the site map.

9 Q. Okay. Does --

A. Like I say, the north and east, if you

21 want to be accurate, I mean, yeah, you need to have

22 that.

15

23 Q. Okay.

A. I mean, the size and lithology and stuff,

Page 48

1 that's for geologists. That's not for me.

Q. Let's go back to this. I'm sorry. I keep

3 closing them.

4 MR. McGINLEY: Hold on a second here. I

5 think that's your copy. I don't want to get it

6 confused.

7 BY MS. BRICE:

Q. Okay. Let's go to Gobelman Figure 1 in

9 Exhibit 3, okay? Let's stick with that. Are you

10 there?

11 Can you explain to me how you use the

12 State Plane Coordinates with respect to this figure?

A. Again, I mean, I need to know, for

14 example, I mean, this side, does it belong to what

15 State Plane, if it's east or west.

6 Q. Right. But how do you know how to put the

17 coordinates on the map with respect to the image?

18 A. What do you mean how? The coordinates are

19 there. It shows it, the label.

20 Q. Okay.

21 A. I mean, you put it in correct, I mean, the

22 label shows correctly.

Q. Is there anything that you have to do to

24 verify that the map is lining up appropriately with

1 the State Plane Coordinates? Is there a way to do 2 that?

- 3 A. For example, like what? What do you mean?
- Q. I don't know. That's why I'm asking. I
- 5 mean, how do you verify that you've got --
- 6 Okay. You've got an aerial image, right?
- 7 That sometimes has topography, right?
- 8 A. Right.
- 9 Q. So there could be things going up and
- 10 down, and it's not a completely flat surface,
- 11 correct?
- 12 A. Right.
- Q. So you're putting your State Plane
- 14 Coordinates on here, and assuming it's a flat
- 15 surface, to some extent --
- 16 MR. McGINLEY: Objection. Misstates the
- 17 witness's testimony.
- 18 BY MS. BRICE:
- 19 Q. Okay. Just explain.
- 20 A. It's just an image. It's not a terrain.
- 21 What you're asking me, is this showing terrain, or
- 22 contours, or what?
- Q. No. What I'm trying to find out is if
- 24 these State Plane Coordinates that you have on the

- A. I'm not talking a different language here.
- 2 It's what --
- 3 Q. I get it. You're doing your best. I
- 4 understand and I appreciate that. Thank you. So,
- 5 you know, if my questions are confusing, just tell
- 6 me that and maybe we can help figure out a better
- 7 way to say it.
- 8 A. Okay. I'll try.
- 9 Q. Okay. We're going back to -- this is -- I
- 10 just want to make sure we've got the right one in
- 11 front of us, Exhibit 3, which is the Supplemental
- 12 Report in Gobelman Figure 1, right?
- 13 A. Right.
- 14 Q. This report has lots of different figures,
- 15 right, that sort of are right behind it. It's got
- 16 Figure 2, Figure 3, Figure 4, Figure 5, 6, 7 and 8.
- 17 A. Yes.
- 18 Q. Did you create each of these figures?
- 19 A. Yes.
- 20 Q. Okay. And then if you turn -- there's an
- 21 EX-2 in here further at the back.
- 22 A. Further in the back?
- MR. McGINLEY: Yeah, towards the back.
- 24 BY MS. BRYCE:

Page 50

- 1 Gobelman Figure 1 are a hundred percent accurate as
- 2 to how they line up with respect to Site 3.
- 3 A. Yeah, because the software, when you set
- 4 it, it shows the image and stuff automatically.
- Q. The Google image?
- 6 A. No. The image in the software, it
- 7 generates automatically.
- Q. Okay. It's tough to explain to you guys
- $\,$ 9 when you're not operating this thing, you know.
- 10 MR. McGINLEY: Can we take a break?
- 11 MS. BRICE: Sure.
- 12 (A brief recess was taken.)
- MS. BRICE: Okay. Are you ready to go
- 14 back on the record?
- 15 THE WITNESS: Yeah.
- 16 MS. BRICE: Okay.
- 17 BY MS. BRICE:
- 18 Q. And I just want to say for the record, I'm
- 19 not trying to frustrate you, it's just that I don't
- 20 know how CAD works.
- 21 A. I know. I'm trying to explain to you
- 22 guys, but you guys have no idea. I don't know what
- 23 else --
- Q. You're doing your best.

- Page 52 Okay. And did you create this map, this
- 2 EX-2?

1

3 A. Yes.

Q.

- 4 Q. Okay, perfect. Okay. So thank you.
- 5 So let's go back to Gobelman, and as I
- 6 understand it, all of the maps start off of the
- 7 basemap and then you added things or you compared
- 8 things, is that correct? All of the figures?
- 9 A. Yes. Yes.
- 10 Q. So the basemap is the, you know -- what's
- 11 the right word? How would you describe it?
- 12 A. The basemap, it's just -- most of the
- 13 time, basemap is the aerial image. You can see what
- 14 the detail -- the site features.
- 15 Q. Okay. And on this basemap there's a few
- 16 things you have on there, correct? On Gobelman
- 17 Figure 1, right? You've plotted a few things.
- 18 A. Yes
- Q. Correct? Okay. But this basemap was then
- 20 used as the basis or the foundation for the other
- 21 maps.
- 22 A. Correct.
- Q. What point of reference did you use in
- 24 creating this basemap?

MR. McGINLEY: Objection. Vague and 2 ambiguous.

THE WITNESS: Are you talking about this

- 4 one, the image, or what are you talking about? The
- 5 line?
- 6 BY MS. BRYCE:
- This whole map. Like, I understand that
- 8 you have to use points of reference to be able to
- 9 create maps, correct?
- A. Yes. Like I say, I need to know what 10
- 11 coordinates system it's in, set it, generate an
- 12 image. It automatically generates for me.
- But on this map right here, Gobelman
- 14 Figure 1, what point of reference did you use in
- 15 creating this map?
- I don't understand what you're trying to 16
- 17 ask me. Point of reference, like, what?
- Q. Do you know what I mean by point of
- 19 reference? Is that something that you learned, you
- 20 know, with respect to working with CAD? Is that not
- 21 a familiar term, point of reference?
- 22 A. No.
- Ο. Okay. Are the maps here contained in
- 24 Exhibit 3 accurate in your mind in how they depict

And the right-of-way line isn't preset in

2 the program.

4

9

- 3
 - And the outline of Site 3 and Site 6 --Ο.
- 5 Α. Right.
- -- isn't preset, right? Q.
 - Α. Right.
- So how do you know those are accurate? 8
 - Α. From the image, the overlay on my match,
- 10 the site features.
- Okay. So just from doing -- trying to Ο. 11
- 12 match them, you think that they're accurate?
- Α. Correct.
- Okay. 14
- A. Because, you know, if you have just a PDF 15
- 16 only, you've got to use some kind of features you
- 17 can go to.
- Q. Okay. Did you do -- did you take any
- 19 extra steps to verify that these were accurate,
- 20 other than just overlaying the figures that
- 21 Mr. Gobelman gave you?
- I don't know what you're trying to ask me.
- 23 Like, what? Fact check? Like, what?
- Q. Yeah.

Α.

1

11

- ${\tt 1}$ the various locations of the things that are plotted
- 2 on here?
- MR. McGINLEY: Objection. Lacks
- 4 foundation.
- 5 BY MS. BRYCE:
- Well, you created the map, right? Ο.
- Α.
- And you were trying to be as accurate as
- 9 possible, I imagine.
- Yes.
- Okay. So do you think that they are --
- 12 these maps and figures that you created are
- 13 accurate?
- A. Yes. 14
- 15 Q. Okay. And why?
- From the -- I mean, from the image, the
- 17 coordinates, it's pretty much preset in the program,
- 18 so, I mean, it's accurate.
- Okay. But the borings on here aren't 19 Ο.
- 20 preset in the program.
- 21 Right. Α.
- Okay. And the -- the northeast excavation
- 23 isn't preset in the program, right?
- Right. 24

- Page 56 That's all I have is the PDFs.
- Ο. So you just took what Mr. Gobelman gave
- 3 you and overlaid them?
- Yeah. And the PDF for him to review, is
- 5 it good or not?
- Are the features that you have here --
- 7 let's just take the northeast excavation -- is that
- 8 an approximation or is that sort of, you know,
- 9 exactly where it is, if you know?
- From what I know, probably approximate.
 - Okay. And how far off might that be?
- I don't know. 12
- Could it be off by, you know, ten feet? 13
- 14 Could it be off by 30 feet?
- 15 It can't be off 30 feet.
 - Okay. That's what I'm just trying to ask.
- No. Probably a couple; a feet, two. 17
- Q. Two to three feet? 18
- No. It can't be three unless the man Α. 19
- 20 don't know how to measure.
- Okay. Did you do anything -- did you make Q.
- 22 any measurements to place this northeast excavation
- 23 in here?
- 24 A. So, to me, from the look of this, I mean,

Mike Nguyen 3/20/2019 Page 59

Page 57

1 again, it's been a long time, but Mr. Gobelman had

- 2 to give me some kind of distance maybe from the
- 3 upper right corner, go through certain feet or
- 4 something.
- 5 Q. So he would --
- 6 A. I can't really pop this sucker in without
- 7 instruction, you know.
- Q. So what kind of information would you want
- 9 to be able to put that northeast excavation?
- 10 A. Probably just the distance from where --
- 11 from the distance from. For example, either to the
- 12 northeast corner of it, then go certain feet.
- 13 Q. Uh-huh.
- 14 A. And then the size of the -- the northeast
- 15 excavation area, you've got to put in the -- I mean,
- 16 the length and the width.
- 17 Q. Okay. How about with respect to the
- 18 northern -- so on this figure you can see that
- 19 you've got this dotted line here at the very top
- 20 that is demarking Site 3, is that right? Is this
- 21 the Site 3 boundary on this map?
- 22 A. Yes.
- Q. The dotted line? And, above that, you can
- 24 see there's some area where there appears to have
 - Page 58
- 1 been some work done that's kind of sand colored,
- 2 right?
- 3 A. Yes.
- Q. Okay. How did you know where to put the
- 5 northeast excavation from the perspective of
- 6 north-south? Because you talked about this many
- 7 feet from the northeast corner. Like, how did you
- 8 know how far to put it north-south?
- A. Again, if -- from the information
- 10 Mr. Gobelman gave me.
- Q. So he would just tell you "put it here,"
- 12 and you'd put it there?
- A. Yes.
- Q. Okay. Let's turn to Figure 2. Do you
- 15 know what you used to plot the location of that hash
- 16 line that says "G gas line"? It's the Nicor gas
- 17 line. Do you know what source you used to plot
- 18 that?
- 19 A. I can't remember, but it has to be the
- 20 figure, like a hash -- yeah, it has to be the source
- 21 from one of the figures that Mr. Gobelman gave to
- 22 me.
- 23 Q. Okay.
- 24 A. They give you the -- like, that's a gas

- 1 and that's a utility, like electric. Yeah, I
- 2 remember a whole bunch of utilities, too, not just
- 3 the gas, though.
- Q. Yeah. So if you turn the page, you'll see
- 5 Gobelman Figure 3.
- A. Oh, yeah. Water.
- Q. So do you know what you used to plot the
- 8 water line?
- 9 A. From the -- I think from the PDF file from
- 10 the report or something.
- Q. Okay. And let's turn to the next one,
- 12 Gobelman Figure 4.
- 13 A. Yeah. I see a whole bunch.
- Q. Yeah. There's a bunch of telephone lines.
- 15 Do you know what you used to plot the telephone
- 16 lines, or is it just whatever Mr. Gobelman gave you?
- 17 A. No. From the PDF file from the report, I
- 18 think.
 - Q. From which report?
- 20 A. I can't remember. It has to be something.
 - Q. Hold on. I think I might have it. Let me
- 22 see if I've got the right one.
- Okay. I'm handing you what is JM 0040322,
- 24 and it's part of Exhibit 2. Is this the document

- 1 you're talking about?
- A. Yeah, yeah. I think this one, yes. It
- 3 has the hash and the line.
- 4 Q. Okay. So this is the document you used to
- 5 plot --
- 6 A. Yes.
- 7 Q. -- the gas line and the -- there's two gas
- 8 lines, right?
- 9 A. Right.
- 10 Q. And to plot the water line, right?
 - A. (Witness nods in the affirmative.)
- 12 Q. And I don't think this has the AT&T lines
- 13 on it. Do you know?
- 14 A. Show me something. I think that one has
- 15 it.
 - Q. I think that one has it. So this is
- 17 the -- this has AT&T lines on it, right?
- 18 A. Yeah. That's why this project's got a
- 19 whole bunch of different sources. Sometimes I can't
- 20 remember.
- 21 Q. Sure.
 - A. You're asking me, like, two and three
- 23 years ago, and I'm, like...
- 24 Q. Just for purposes of the record, the AT&T

 ${\tt lines}$, the document you're pointing to is Figure 1

- 2 of Expert Report of Doug Dorgan, which is Exhibit 4.
- 3 A. Yes. Yes.
- 4 Q. Okay. There's also -- I want to show you
- 5 on -- this is also attached to Gobelman Initial
- 6 Report, Exhibit 2, and it's JM 0039111. Did you use
- 7 this map at all in plotting things with respect --
- 8 A. I can't remember.
- 9 Q. Okay. And then behind that is JM 0040329.
- 10 Do you remember if you used this?
- 11 A. I can't remember.
- 12 Q. Okay. And same question for JM 0039114.
- 13 A. I can't remember.
- 14 Q. Okay. At some point, and you mentioned
- 15 this earlier, you -- was it you or was it
- 16 Mr. Gobelman that determined that the figures didn't
- 17 line up?
- 18 MR. McGINLEY: Objection. Assumes facts
- 19 not in evidence.
- 20 BY MS. BRICE:
- Q. Okay. You said something about the --
- 22 earlier, you said something about the things not
- 23 lining up. What wasn't lining up?
- 24 A. The site boundary.

Page 62

- 1 Q. The site boundary.
- 2 A. Yeah, from different sources not lining
- 3 up.
- 4 Q. From the different sources.
- 5 A. Yes.
- 6 Q. And who came to that conclusion?
- 7 A. Man, I can't remember who.
- Q. Well, somebody obviously realized that,
- 9 and what I'm trying to understand is, was it you or
- 10 Mr. Gobelman?
- 11 A. Probably me.
- 12 Q. And you then said to him, They're not
- 13 lining up, I imagine?
- 14 A. Yes.
- Q. And then this is EX-2 on the initial
- 16 report, which is Exhibit 2, okay? And then I'm
- 17 going to turn to $\mathtt{EX-2}$ on the Supplemental Report,
- 18 which is Exhibit 3, okay?
- 19 Okay. So here's the initial report, okay?
- 20 And this is the Supplemental Report. So the EX-2s
- 21 are different, right?
- 22 A. Yes.
- Q. Okay. What's different about them?
- 24 A. Oh, it's the -- the boundary from the

- 1 north, it's further up. The other one is further
- 2 down for that one.
- 3 Q. So in the Supplemental Report --
 - A. The site boundary is to the south.
- 5 Q. A little bit south.
 - A. Yes

4

- Q. Do you remember discussions with
- 8 Mr. Gobelman about putting the site boundary along
- 9 the fence line at any point in time?
- 10 A. I can't remember that.
- Q. Okay. So, in this one, what are you
- 12 trying to show about the site boundaries lining up
- 13 or not lining up? You're comparing different
- 14 sources, but what's the conclusion to be drawn from
- 15 this map?
- 16 MR. McGINLEY: Objection. Lacks
- 17 foundation, assumes facts not in evidence.
- 18 BY MS. BRICE:
- .9 Q. Well, you created the map, right?
- 20 A. Yes.
 - Q. And what were you trying to show? This is
- 22 the Supplemental Report.
- A. That's the differences between different
- 24 sources.

21

- ${\tt Q}.$ Okay. But it's true, is it not, that the
- 2 variation is much bigger in Exhibit 2, which was the
- 3 Initial Report, versus Exhibit 3, which is the
- 4 Supplemental Report.
- 5 MR. McGINLEY: Objection.
- 6 BY MS. BRICE:
- 7 Q. They're more aligned in the Supplemental
- 8 Report than they are in the Initial Report, the
- 9 sources?
- 10 MR. McGINLEY: Objection. Lacks
- 11 foundation.
- 12 BY MS. BRICE:
- Q. You created both of these documents,
- 14 right?
- 15 A. Yes
- 16 Q. Can you look at them and tell me if they
- 17 look more aligned or not?
- 18 A. Well, which one is aligned?
- 19 Q. Well, you've got all these different
- 20 colors, and then here --
- 21 A. You can't tell the difference between --
- 22 Q. Let's go with the red line and the black
- 23 line.
- 24 A. Okay.

Page 65

- Okay. Are they more aligned in the black 2 dotted line in the Supplemental Report than they are
- 3 in the Initial Report?
- Yeah. That's what I'm saying. This one
- 5 and then this one, it's different because in this
- 6 one, it's a little bit on the south end side.
- Q. Okav.
- That's the only one that's different.
- Was there a survey that you looked at at
- 10 one point, an Atwell survey? Do you remember that?
- 11 Yes. Do you have a map or something I can
- 12 see figures?
- No, but it's on here. If you go -- if you
- 14 look at -- I don't have the map, but it says
- 15 approximate Site 3 limit, Atwell Group.
- MR. McGINLEY: For the record, it's 16
- 17 actually included -- what Mr. Nguyen is talking
- 18 about is actually included in Exhibit 4.
- MS. BRICE: Okay. Perfect. 19
- 2.0 THE WITNESS: Okay.
- MS. BRICE: I can't see what you're 21
- 22 talking about.
- 23 MR. McGINLEY: It's the next-to-the-last
- 24 page.

Page 66

- 1 BY MS. BRICE:
- Okay. Do you remember working with this Ο.
- 3 map?
- Α.
- Okay. And what did you use this map for?
- Man, I can't remember because there's so
- 7 much information. I can't remember back then what
- 8 Mr. Gobelman asked me, what information to use.
- Okay. I want Exhibit 3 again, and if we
- 10 can go to -- we're in Exhibit 3, the Supplemental
- 11 Report, and go to Gobelman Figure 4. There are
- 12 these hash marks along portions of the AT&T lines.
- 13 Why?
- I don't know. Maybe Steven told me to 14
- 15 hash it, I guess.
- And did he ask you to make calculations of
- 17 linear feet?
- 18
- Okay. On Gobelman Figure 5, the next 19
- 20 page, there's part of it that's pink and part of it
- 21 that's green. Do you know why?
- 22 No. No, I don't.
- Go back to Figure 1, please. So 23
- 24 we're back to the basemap on the Supplemental

- 1 Report, which is Exhibit 3, Figure 1. Yeah.
- So you said that when you created this
- 3 Supplemental Report, you had to change the northern
- 4 boundary, right? Because it wasn't consistent
- 5 with -- there was a new source document that you
- 6 used.
 - Α. Yes.
- Okay. What else did you move after you 8
- 9 moved the northern boundary?
- What else did I move? 10
- Did you move anything else? Ο. 11
 - I can't remember.
- Okay. Would Mr. Gobelman have e-mailed
- 14 you to tell you what to move and what not to move?
 - Yes. Either e-mail me or tell me.
- Okay. If he wanted you to move something 16
- 17 that you disagreed with, would you tell him that or
- 18 would you just move it?
- If he tell me to move it, I'd move it,
- 20 because I don't know -- I don't know what --
- So that map that we were looking at
- 22 earlier, which is this one here, IDOT 002845, which
- 23 I believe you testified was the new source that you
- 24 used for the northern boundary on Gobelman Figure 1

1 of Exhibit 3, is that right?

- Α. Yes.
- Okay. Why did the location -- and I'm
- 4 going to refer to this as 0393, okay? Because
- 5 that's how it's been referred to in this case is
- 6 this sort of right-of-way, the 0393 right-of-way.
- Why did the change in the location of 0393
- 8 require you to move the northern boundary of Site 3?
- I think this one, I go by the bearing and
- 10 distances on this map.
- Uh-huh. Right. That's how you used --
- 12 you put in 0393, but then why did you have to move
- 13 the northern boundary of Site 3?
- Why did I have to move it? I don't know.
- 15 I'm not the decisionmaker on why I moved that thing.
- So you don't know why you moved the
- 17 northern boundary of Site 3?
- Yeah. I think from what I remember, I
- 19 mean, I used this one, created it out and then
- 20 showed Mr. Steve, Mr. Gobelman, what's going on.
- Ο. And what did he say? 21
 - I can't remember back then what he say.
- Okay. All right. If you can go back to 23
- 24 Gobelman Figure 1 on this same document, the one

Mike Nguyen 3/20/2019 Page 71

Page 69

1 we're just looking at on this Exhibit 3, the

- 2 Supplemental Report. And this is just a question
- 3 I'm trying to understand. You have in here Site 6.
- 4 Do you see that where that's written, Site 6?
- Α. Yes.
- How far down does Site 6 come and what are
- 7 you trying to show? Are you showing that Site 6
- 8 stops at the road, or does it go all the way down to
- 9 Site 3, the Site 3 boundary?
- I'm just trying to understand, and maybe 10
- 11 if you can mark with a pen on that document where
- 12 Site 6 is.
- 13 Α. So which one?
- Sure. You can mark on it.
- 15 So Site 6.
- Yeah. 16 Ο.
- So there's a line. Probably the limit's
- 18 right here, so I can draw it right here. Okay.
- 19 That's the limit.
- Okay. So it's going all the way down to
- 21 where it is basically co-extensive or similar to the
- 22 Site 3 boundary, is that right? So they sort of are
- 23 up against each other, the Site 3 and Site 6
- 24 boundary. That's just what I'm trying to

Page 70

- 1 understand. Is that what you're depicting?
- I don't know. It's just Mr. Steve
- ${\tt 3}$ instructing me because the history of this site, you
- 4 know, I mean, if he want me to draw all the way down
- 5 here, I'll draw all the way down there. I really
- 6 don't know.
- Understood. But what is this showing?
- 8 Like, what are you trying to say? Are you trying to
- 9 say that Site 6 comes down to this dotted line, or
- 10 are you trying to say something different, or did he
- 11 draw that line? I don't understand.
- I can't remember. 12
- MR. McGINLEY: Objection. Vague and 13
- 14 ambiguous.
- 15 THE WITNESS: I can't remember.
- 16 BY MS. BRICE:
- Okay. But you can't tell me where Site 6
- 18 is, or you can. Based upon your map --
- Α. Right. 19
- -- I want to know where Site 6 is. 2.0
- So pretty much right here. 21
- Okay. Can you do the whole thing? Can
- 23 you outline the whole thing for me?
- So I can -- basically, it's just from 24

- 1 here, and then one of it includes here, that's Site
- 2 6, so I can do like that.
 - Q. Okay. Thank you.
- I don't know how far it goes. I don't
- 5 know.
- Perfect. Thank you. That's helpful. Q.
 - Okay.
- How did you determine the northwest corner 8
- 9 on this map, this Figure 1, the northwest corner
- 10 location for the northern boundary of Site 3?
- MR. McGINLEY: Objection. Lacks
- 12 foundation, assumes facts not in evidence.
- 13 BY MS. BRICE:
- Okay. You created the map, right?
- 15 Yes. I created the map.
- And there's a corner. There's a northwest
- 17 corner on the map, correct, for Site 3?
 - Are you talking about this corner? Α.
- Ο. Yep. Northwest corner.
- - How did you determine where that was?
- 22 What document did you use?
- I can't remember where this document came
- 24 from.

21

- Okay. The same question for the northeast
- 2 corner. Do you know how you determined where the
- 3 northeast corner was located?
- I can't remember. It has to be a document
- 5 somewhere. Yeah, I can't remember.
- How many drafts did you do of these maps Ο.
- 7 and figures?
- MR. McGINLEY: Objection. Vague and
- ambiguous, assumes facts not in evidence.
- THE WITNESS: I can't remember.
- 11 BY MS. BRICE:
- Q. Did you do multiple drafts of these maps
- 13 and figures?
- MR. McGINLEY: Objection. Vague and
- 15 ambiguous.
- 16 BY MS. BRICE:
- Did you do drafts of these maps and 17
- 18 figures?
- Yes. I do drafts and figures for this, 19 Α.
- 20 but how many, I can't remember how many.
- 21 Ο. Okay. Was it more than five?
- 22 I can't remember. Α.
- 23 More than three?
- I can't remember how many. 24

Page 73

Q. So you did more than one?

A. Yes, more than one. I can safely say more

3 than one.

1

Q. And when you made changes to the drafts,

5 what prompted you to make those changes? Was it

6 Mr. Gobelman telling you to change it?

A. Yes.

8 Would you make any changes on your own?

9 A. No, no. I have other things to do. I'm

10 not -- no, no, no. For the record, no.

11 Q. Did you talk to anyone else at Andrews

12 about the figures in these reports other than

13 Mr. Gobelman?

14 A. No, just -- yeah. This figure, just

15 Mr. Gobelman and me.

16 Q. How about anyone at IDOT? Did you talk to

17 anyone at IDOT at any point in time?

A. No. My job, I don't deal with clients, I

19 deal with drawing. That's just my job. I know it's

20 a little bit boring, but it's my job.

Q. I'm just trying to understand how it all

22 works, because it could be possible that, you know,

23 you have lots of input into things. I just don't

24 know, right?

Page 74

A. We're just talking about how we operate in

2 the software, yes. I give you inputs, but how to

3 come up with, like, a document how to show, like,

4 specifically one, that's really not my job. That's

5 the project manager's job what needs to be shown.

6 Q. Understood. Okay. You can put these away

7 for a minute -- not forever.

8 I'm going to hand you a map that we're

going to mark as Deposition Exhibit 5.

10 (Nguyen Deposition Exhibit Number 5

11 was marked for identification.)

Okay. Have you seen this document before?

13 A. Yes.

Q. Okay. And I've actually -- switch with me

15 because I've got markings on that one. It's just

16 easier. And what is this? What's your

17 understanding of this document?

18 A. It's a site map.

19 Q. Right. And it says Andrews over here on

20 the right. Do you see that?

21 A. Yes. Our logo, yes.

Q. So did you create this map?

23 A. Yes. All this is from other report from

24 other consultant. I think this one looked like the

1 one from -- that we were doing something?

Q. Uh-huh. But what did you do to this map?

3 You said you...

4 A. Just overlaid the file and popping our

5 company border.

Q. Okay.

A. The notes.

8 Q. And it's dated March 2016. Do you

9 think -- is that your date? Is this when you worked

10 on that?

1 A. I mean, yes. It's my name on it.

12 Q. Okay. That's all my questions for that

13 one.

21

14 I'm going to -- I'm handing you Deposition

15 Exhibit 6, which is SG 004530. Have you seen this

16 document before? Okay. Do you recognize this map?

17 (Nguyen Deposition Exhibit Number 6

18 was marked for identification.)

19 A. Yes.

Q. Okay. Did you create this map?

A. Yes.

22 Q. Okay. And it says April of 2018. Do you

23 think that's generally when you created the map?

A. Yes.

Page 76

Q. Okay. And what are you trying to show

2 here? There's an area that's pink. What are you

3 trying to show in the pink area?

A. I don't know.

Q. So is that something Mr. Gobelman would

6 have said "make that pink?"

7 A. Yes. You can -- probably to differentiate

8 between different black and blue.

9 Q. Okay. But as you sit here today, you

10 don't understand why that's pink, is that correct?

1 A. No. We use pink, blue. Yeah. I don't

12 know.

Q. Okay. I'm handing you what's been marked

14 Deposition Exhibit 7, which is SG 004529. Did you

15 put this map together?

16 (Nguyen Deposition Exhibit Number 7

17 was marked for identification.)

18 A. Yes.

19 Q. Okay. And do you believe this map to be

20 accurate?

21 A. Yes.

Q. Okay. I'm handing you Deposition

23 Exhibit 8, which is Figure 1 dated June 2018, SG

24 004532. Did you create this map?

(Nguyen Deposition Exhibit Number 8 1

was marked for identification.)

Yes. 3

Okay. In the bottom there, it says, Lake Ο.

5 County, Illinois, GIS DIV. What is that?

Probably the data from the website, Lake

County, Illinois, GIS website.

Okay. So you used that website to

9 generate some of the data for the -- I'm assuming

10 the State Plane Coordinates? I don't know.

Again, I can't remember what data I used

12 for this website.

Okay. If you'll go to sort of right up

14 here at the northeast corner, there's a measurement

15 that goes north-south, and I think it says

16 11.91 feet. Do you see that? Is that what that

17 savs?

18 Α. Yes.

Okay. What is this depicting? Why is

Well, either the -- the distance between 21

22 the site boundary to the boring or -- I can't

23 remember if there's a right-of-way somewhere in

24 here.

Page 78

Page 77

So you're not sure what you're measuring?

I can't remember. I mean, it has to be

3 there for a reason.

Yep. Okay. I'm going to -- one more map.

5 I've given you what's been marked Deposition

6 Exhibit 9. It does not have a Bates stamp number on

7 it. It was given to us without a Bates stamp

8 number, but it says Gobelman Figure 3, August 2018.

9 Do you recognize this document?

10 (Nguyen Deposition Exhibit Number 9

was marked for identification.) 11

Yes. 12

Okay. What is this? What -- back up. 13 Ο.

14 Did you create it?

15 Α. Oh, man. I don't know. Sorry. I can't

16 remember.

Well, your name's on the right, down over 17

18 here where it has your initials.

Yeah, but I think it's somebody else, 19

20 though.

22

21 Ο. Last saved by Don L. Jenkins?

Yeah. I mean, my initial's on the border.

23 But you don't remember creating this?

Yeah, I can't remember. 24

Who's Don L. Jenkins?

I don't know.

3 Does Don L. Jenkins work at your company?

4 Α. No, no.

Do you think somebody else created this? Ο.

6 You said it's somebody else. What did you mean by

7 that?

Well, it has a different name on the 8 Α.

9 border.

Over there on the left-hand side? Ο. 10

Yes, on the left-hand side. Α. 11

Okay. I now want to talk just generally Q.

13 about the Supplemental Report a little bit more,

14 which was Exhibit 3.

15 Okay.

MS. BRICE: If you wouldn't mind pulling 16

17 that out, Evan, I'd appreciate it.

18 BY MS. BRICE:

So I'm trying to understand the genesis of

20 this, how this came about, and I know you said that

21 Mr. Gobelman said that here's a new source document.

Right. 22 Α.

Ο. Right? Did you guys talk at all about

24 whether the old source document was right or --

Page 80

1 scratch that.

Did you have conversations about the

3 source document, or did you just do what he told you

I can't remember at that time.

Well, this was about six months ago or 6

7 four months ago. It was October.

That's too long for me. 8

Ο. You don't remember anything about it?

I'm sorry. I can't remember.

Did you ever talk to anyone from IDOT

12 about any of these figures?

No, I don't. Α.

Did you ever talk to anyone from the

15 Illinois Attorney General's Office about these

16 figures other than Evan --

Yeah. No, I don't... 17 Α.

-- in preparation for today? Do you have 18

19 any idea why this Supplemental Report was prepared?

Α. Yeah, I don't know why. 20

Ο. And as we've gone through, there's a lot

22 of figures in this Supplemental Report. Did you do

23 drafts of these figures?

A. I can't remember. I mean, all the

Page 81

1 drawings, these would be in the project folder.

- Okay. I'm going to hand you -- I'm sorry.
- 3 This is just so confusing because we have so many
- 4 maps, but let me -- I'm going to make sure I do this
- 5 right.
- I'm handing you what's been marked
- 7 Deposition Exhibit 10, and this is a group exhibit,
- 8 and it is also marked Gobelman Deposition Exhibit
- 9 Number 5, okay? So that will be a good reference
- 10 for the record.
- This is a series of maps, and the date on 11
- 12 here says August 2018, and I want to know if you
- 13 know -- if you put these maps together.
- (Nguyen Deposition Exhibit Number 10 14
- 15 was marked for identification.)
- Yes, I put the maps together. Α. 16
- 17 Ο. Okay. Do you believe them to be accurate?
- 18 Α. Yes.
- I want you to make sure you've had time to
- 20 look through everything.
- 21 Α.
- 2.2 Okay.
- MR. McGINLEY: Is there a reason why 23
- 24 there's blank pages in here?
- MS. BRICE: I have no idea. That's just
- 2 the way that it copied. That's unintentional.
- MR. McGINLEY: I was just curious.
- 4 BY MS. BRICE:
- Okay. So other than the documents we've
- 6 discussed, you know, and I'm showing you different
- 7 documents, you said, yeah, we use that as a source
- 8 document, etc. Is there any other source that you
- 9 can think of as you sit here today that you used in
- 10 putting together these figures and maps?
- I can't remember. 11
- If there was a source that you used other
- 13 than what I've shown you, would you have gotten it
- 14 from Mr. Gobelman?
- 15 Α. Yes.
- I just have to ask the question, but I
- 17 imagine you haven't visited this site, correct?
- 18 No. No, I have not.
- You used a different Google image in the Ο. 19
- 20 Supplemental Report than you did in the initial
- 21 report?
- 22 Α. Yes.
- 23 Ο. Do you know why?
- I think it's probably a more recent date 24

- 1 of aerial flow.
 - If we can go back to Exhibit 4 for a
- 3 second, and you said that you'd seen this Figure 1
- 4 before in Exhibit 4, correct?
- Α. Yes.
- Q. And do you dispute the accuracy of this
- 7 map?
- What do you mean, just right or wrong? 8
- 9 Ο.
- You mean from the look of this or... Α. 10
- Just in general. Ο. 11
 - Α. I mean, it can be wrong.
- Right. But do you have an opinion on 13
- 14 that?

12

15

- Yes, I have an opinion. It can be wrong.
- It can be wrong but that's not --16 Ο.
- Α. Well --17
- I'm sorry. Q.
- Α. Okay.
- Of course, it can be wrong and it can be
- 21 right, so I'm just trying to understand. Do you
- 22 think that this is wrong, this map, Figure 1, which
- 23 you said you used for the telephone lines?
- I mean, it has to be -- like I said, it

- 1 can be right, it can be wrong. I mean, what our
- 2 survey data -- let's see.
- So you don't know. I'm just trying to Q.
- 4 figure out if you know or not.
- No, I don't. I mean, if you can give me
- 6 just this figure, I don't know. I cannot figure it
- 7 out.
- Okay. I'm handing you what's been marked
- 9 Deposition Exhibit 11. It's SG 000594, and if you
- 10 turn the page, and this is just the way it came to
- 11 me, SG 000595, okay? So do you recognize this
- 12 e-mail?
- (Nguyen Deposition Exhibit Number 11 13
- was marked for identification.) 14
- 15 Α. Yes.
- Q. Okay. And what's he asking you to do
- 17 here?
- Yes. 18
- Okay. What is he asking you to do in your 19 Ο.
- 20 words?
- Overlay the PDF file into the figure and Α.
- 22 create a new figure.
- Ο. Okav. 23
- Α. Don't need all the borings, the location 24

- 1 or the red circles.
- Okay. If you note this has the S drive,
- 3 right, noted on here, and it says Figure 1, REV
- 4 5-13-16, right?
- Yes. Α.
- Okay. Would this document still be in the Q.
- 7 S drive?
- Yes.
- Q. Okay. I'm handing you Deposition
- 10 Exhibit 12. This is SG 000861 through 871. If
- 11 you'll take a moment to look through this, I'd
- 12 appreciate it.
- 13 (Nguyen Deposition Exhibit Number 11
- was marked for identification.) 14
- Okay. So you'll notice down here, it 15
- 16 actually was the earlier e-mail, the April 30th,
- 17 that said, "Create a new PDF. I don't need all the
- 18 boring locations or red circles, " and answered back,
- "Is this okay?" And then he says "other figure".
- 20 What is that in reference to, do you know?
- 21 Yeah. I can't remember.
- Okay. Above that you say, "This one, the
- 23 horizontal is off." Can you explain that to me, and
- 24 does that have anything to do with the map on the

Page 86

- Pretty much the e-mail, I say horizontal
- 3 is off, it's this line, the boundary lines, and the
- 4 dashes, boundary lines, are off horizontally.
- Okay. But the one on the top is not off,
- 6 right? It's not off horizontally.
- That's vertically. To me, that's
- 8 vertically this way and horizontally this way.
- Oh, okay. So you were just motioning what
- 10 I would call east-west as horizontally so...
- Okay. Terminology, I guess. 11
- No, this is the thing. For the record,
- 13 I'm just trying to...
- Okav. 14 Α.

1 next page?

- So you're basically saying that this
- 16 dotted line that goes along the east side of Site 3
- 17 is not aligning with this other dotted line --
- 18
- -- that's right next to it. Ο. 19
- No, no, no. The dash lines is not matched
- 21 with this line.
- 22 With the blue line.
- 23 Blue line, correct.
- With the blue line, okay. And so -- and 24

- 1 do you know where you got the blue line?
 - The blue line is in the figure that --
- 3 Was that the Atwell survey?
 - No, this one. Α.
- This one. So you think the blue line --Ο.
- 6 gotcha. This blue line you're saying is not
- 7 matching here. Got it.
- Yes. This dash line right here, it's a Α.
- 9 site boundary.
- Okay. But eventually you compared the Ο.
- 11 site sources, and that's your EX-2 in the
- 12 Supplemental Report, right?
- Α. Yes. With the three, right, the red, the
- 14 blue, yes.
- Q. Okay. If you turn a couple pages and
- 16 there's an SG 000866 and 867. I'm just trying to --
- 17 are these just different drafts? Like, what's going
- 18 on here? What are these documents?
- I don't know. Α.
- Okay. Here we have Deposition Exhibit 13,
- 21 SG 000885 through 886, and there's an e-mail from
- 22 you to Mr. Gobelman that says, "Please review. I
- 23 started B-345 location. It's just below the
- 24 right-of-way." Why did you say that?

Page 88

- (Nguyen Deposition Exhibit Number 13 1 was marked for identification.)
- I'm just telling him the reference of the 3 Α.
- 4 right-of-way.
 - Right. But why was this important? Ο.
- Yeah, I can't remember. Probably -- I've
- 7 probably got one of the drawings. The distance
- 8 is -- that 11.91, I think, is probably it.
- You think the 11.91 has to do with the Ο.
- 10 B-345 location?
- No, probably from this -- either that or
- 12 from the right-of-way. I think from the site
- 13 boundary to the right-of-way, the 11.91.
- Right. But you're talking about the
- 15 location of B-345, and I'm trying to understand why
- 16 you're talking about that here and why you're saying
- 17 it's just below the right-of-way because it is where
- 18 it is, right?
 - Yeah. Actually, I can't remember. Α.
- Did Mr. Gobelman ask you to move it? 20
- I can't remember. 21
- Is it possible that he asked you to move
- 23 it to below the right-of-way?
- 24 A. I can't remember.

Mike Nguyen 3/20/2019 Page 91

Page 89

1 Q. But is it possible?

2 MR. McGINLEY: Objection, speculation.

THE WITNESS: I can't remember.

4 BY MS. BRICE:

Q. Okay. And then right above that is

6 another e-mail from you that just says "done" and

7 there's no e-mail in between with Mr. Gobelman, and

8 is there a missing e-mail in here?

A. No.

10 Q. So why would you just respond "done"

11 without him sending an e-mail?

12 A. I can't remember.

13 Q. Is that a normal practice for you to just

14 send e-mails that say "done" when there's not an

15 e-mail asking you to do something?

16 A. No. If I finish something, I say "done".

17 Q. But if the person didn't send you an

18 e-mail asking you to do something, why would you

19 just send an e-mail that said "done"?

20 A. Well, it's probably this one.

Q. What are you pointing to?

22 A. Below the word "done", so probably the

23 task, whatever I did, it's probably done.

Q. Okay. I've got another example of that

Page 90

- 1 that we can look at, and I'm handing you Deposition
- 2 Exhibit 14, and there's some highlighting on here,
- 3 which I think is mine -- I don't think that was what
- 4 was originally on here -- and it says MN 000322
- 5 through MN 000400.
- 6 (Nguyen Deposition Exhibit Number 14
- 7 was marked for identification.)
- 8 So take a look again on this -- these
- 9 first couple pages. So let's start at the bottom of
- 10 page 1. Well, no. Let's start at page 2.
- 11 It says, "Create an exhibit showing the
- 12 issue with Site 3 layout that the corners don't line
- 13 up." Do you remember him asking you to do that?
- 14 A. Steve Gobelman?
- 15 Q. Do you remember asking you to do that?
- 16 A. Yes. In the e-mail, yes.
- Q. And then you say, "All done, same
- 18 location."
- 19 A. Uh-huh.
- Q. What is "same location"?
- 21 A. Oh, same location? I saved the file.
- Q. On the S drive?
- 23 A. Yeah.
- Q. And then again, like, 20 minutes later,

1 you say "done" and then the next day or two days

2 later, you say "done". What are you responding to?

A. It's probably the task he asked me to do.

Q. Okay. Did he send you e-mails asking you

5 to do specific things?

A. This probably has to be either on the

7 phone or meet in person and talking.

Q. Okay. But you just said "done" and he's

9 supposed to know what that means?

10 A. Yes. I finished the task.

11 Q. Okay. Again, these got copied with

12 highlighting on them, so I apologize. The originals

13 do not have highlights.

This is MN 00019, and if you could mark it

15 as an exhibit, I'd appreciate it.

16 (Nguyen Deposition Exhibit Number 15

was marked for identification.)

Okay. For the record, this document's

19 been marked Deposition Exhibit 15. I have just one

20 question. Up here at the top, this is June 25th,

21 2018. It says this is S drive, so this looks to be

22 a document and it says sitelimit.kmz. What is that?

23 A. Are you talking about the KMZ file?

Q. Yeah.

Page 92

1 A. It's the file for Google Earth. You can 2 open it up.

Q. So KMZ is a reference to Google Earth?

4 A. It's a file extension, yes.

Q. File extension. Okay. Thank you. Okay.

6 I'm handing you Deposition Exhibit 16,

7 which is SG 002706 through 2707, and you say here,

8 "No good. Both not match with each other rotation

9 and scaling issue." And if you'll turn over, are

10 you -- is this the document you're talking about?

1 (Nguyen Deposition Exhibit Number 16

12 was marked for identification.)

A. I can't remember. Probably.

Q. Okay. Can you explain to me how the

15 rotation and scaling is off on this document?

A. Well, just like the previous -- with that

17 blue and the dash line, that's the issue of the

18 scaling; then sometimes that's the rotation of the

19 site, it's not matching.

20 Q. Okay. So can you, like, draw on there

21 where -- how you can see that the rotation isn't

22 working? Like, is there a spot? If you can maybe

23 just put an X on it.

24 A. So if the -- for the rotation, so it's

- 1 probably from this line right here to this line. So
- 2 that's why the line, it's not matching up. This
- 3 line's matching up. That's talking about the
- 4 rotation of it.
- ${\tt Q.}~{\tt You're}$ talking about the northern boundary
- 6 line?
- 7 A. And also -- yes.
- 8 Q. Okay. Keep going.
- 9 A. And then there's also the scaling issues.
- 10 Can I --
- 11 Q. Sure, please.
- 12 A. So the circle right here.
- 13 Q. So you're making a circle. You're making
- 14 circles.
- 15 A. It's not matching, so...
- 16 Q. Sorry. I'm just trying to so she can --
- 17 we can keep a good record. You made some circles.
- 18 What do those show?
- 19 A. That's for the scaling. It's not lining
- 20 up for all corners.
- 21 Q. Okay

1 that correct?

Α.

22 A. Do you understand?

Correct.

- 23 Q. I think so. So you think that this --
- 24 this is not a map that's accurate in your mind, is
 - Page 94
- 1 what Mr. Gobelman asked you to do?
- Q. Okay. So I'm going to hand you Deposition 3 whatever it
- 4 Exhibit 17 and it has highlighting which was not on
- 5 the original, and all I want to do is direct your
- 6 attention to this first highlighting that said, "I
- 7 revised all the figures, show the right-of-way line,
- 8 borings," etc., and this is dated October 31st,
- 9 2018. What were you trying to tell him here?
- 10 (Nguyen Deposition Exhibit Number 17
- 11 was marked for identification.)
- 12 A. So that's probably the image, the
- 13 right-of-way, the boring, or the site features up to
- 14 date.
- 15 Q. Okay. So you were revising them. Did he
- 16 tell you to revise them or did you just revise them?
- 17 A. Yes. He told me to revise them.
- Q. Okay. And what is this Revision 1 here?
- 19 Do you see that? Do you know what that is in
- 20 reference to?
- 21 A. Probably.
- 22 Q. Just your first --
- 23 A. Yeah, revision.
- Q. Okay. So if there were multiple

- 1 revisions, then it would say -- there would be
- 2 documents that said Revision 2?
- 3 A. Two, yes.
- Q. Got it. Okay. Do you have any idea why
- 5 Ryan Curtis was not involved in creating the maps?
 - A. I don't know.
 - Q. Is he still at Andrews?
- 8 A. No, he's not.
- 9 Q. Okay. There's a -- there's a document --
- 10 it's in the invoices and I can pull it out if you
- 11 need me to, but it's faster for me to ask it to you
- 12 this way. It says on the invoice, "Overlay images,
- 13 check utility locations, revise Site 3 plans, areas,
- 14 boring locations, pay quantities." Do you know what
- 15 pay quantities is referring to?
- 16 A. Oh, it's the area of square footage.
- 17 Q. Okay. So this was what you would have
- 18 been working on with respect to that invoice?
- 19 A. Right.
- 20 Q. If it's that language, just take my word
- 21 for it, it is in the invoice.
- 22 A. Right.
- Q. Okay. And you were checking these things.
- 24 Were you doing your own check or were you just doing
 - Page 96
 - what in. dobelman ablica you to do.
 - A. Well, I have to check from the new source,
- 3 whatever it is we were revising. So just updating,
- 4 I'd have to check, you know what I mean? Because
- 5 if, for example -- so, for example, that I don't
- 6 know what --
- Q. Do you want to pull out Exhibit 3?
- 8 A. No, the one that has the dashes and the
- 9 blue one. So if -- which one we used, for example,
- 10 if the dash line, right, if the utility is way long,
- 11 I have to update the length and the hashing area.
- 12 Q. And the hashing area is in the --
 - A. Right, yes.
- 14 Q. So you would -- when you moved things
- 15 around, you then updated those numbers?
- 16 A. Right.
- 17 Q. But I assume that was at his direction.
- 18 A. Yes.
 - Q. Okay. And if anything was moved between
- 20 Gobelman 1, Exhibit 2, the Gobelman Figure 1 on the
- 21 Initial Report --
- 22 A. Yeah.
- 23 Q. -- you know, we talked about that
- 24 Exhibit 2, and there's the Gobelman Figure 1 on

13

	Page 97		Page 99
1	Exhibit 3, which is the Supplemental Report, if	1	STATE OF ILLINOIS)
2	anything was moved, it was moved because	2) ss: COUNTY OF MACON)
3	Mr. Gobelman told you to move it, is that right?	3	I, LISA HAHN PETERMAN, a Certified
4	A. Yes, to move it.	4	Shorthand Reporter of the State of Illinois, do
5	MS. BRICE: Okay. I don't have any other	5	hereby certify that heretofore, to-wit:
6	questions.	6	On March 20, 2019, personally appeared
7	MR. McGINLEY: No questions for us.		before me MIKE NGUYEN, a witness in a case now
8	(Deposition concluded at 12:37 p.m.		pending and undetermined before the Illinois
9	Signature reserved.)	-	Pollution Control Board. Johns Manville is the
10	FURTHER DEPONENT SAITH NAUGHT.	10	Complainant and the Illinois Department of
11	1 01111111	11	Transportation is the Defendant.
12		12	I further certify that the witness was
			first duly sworn to testify to the truth, the whole
13			truth, and nothing but the truth in the cause
14			aforesaid; that the testimony then given by the said
15		15	witness was reported stenographically by me in the
16			presence of said witness, was thereafter converted
17		- '	
18		18	to the written English word via computer-aided
19		19	transcription, and the foregoing is a true and
20		20	complete transcript of the testimony so given by
21		21	said witness as aforesaid; that the signature of the
22			witness to the foregoing deposition was not waived.
23		23	I further certify that the taking of this
24		24	deposition was pursuant to Notice and that there
			_ 100
	Page 98		Page 100
1	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD	-	were present at the taking of said deposition the
1 2	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of:	2	were present at the taking of said deposition the appearances as hereinbefore noted. I further
_	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD	2	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or
2	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware	2	were present at the taking of said deposition the appearances as hereinbefore noted. I further
2	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation,	2 3 4	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or
2 3 4	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant,	2 3 4 5	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the
2 3 4 5	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF	2 3 4 5	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties
2 3 4 5	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF	2 3 4 5	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the
2 3 4 5 6 7	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, VS. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION,	2 3 4 5 6 7 8	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action.
2 3 4 5 6 7 8	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, VS. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION,	2 3 4 5 6 7 8	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action. IN TESTIMONY WHEREOF, I have hereunto set
2 3 4 5 6 7 8 9	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION, Respondent.	2 3 4 5 6 7 8	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action. IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my notarial seal this 2nd day of
2 3 4 5 6 7 8 9 10	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, Vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION, Respondent. I, MIKE NGUYEN, state that I have	2 3 4 5 6 7 8 9	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action. IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my notarial seal this 2nd day of
2 3 4 5 6 7 8 9 10 11	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION, Respondent. I, MIKE NGUYEN, state that I have read the foregoing transcript of the testimony given	2 3 4 5 6 7 8 9	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action. IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my notarial seal this 2nd day of April, 2019. LISA HAHN PETERMAN, CSR, RMR
2 3 4 5 6 7 8 9 10 11 12 13	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION, Respondent. I, MIKE NGUYEN, state that I have read the foregoing transcript of the testimony given by me at my deposition on the 20th day of March,	2 3 4 5 6 7 8 9 10	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action. IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my notarial seal this 2nd day of April, 2019.
2 3 4 5 6 7 8 9 10 11 12 13 14	BEFORE THE ILLINOIS POLLUTION CONTROL BOARD In The Matter of: JOHNS MANVILLE, a Delaware Corporation, Complainant, Vs. PCB No. 14-3 ILLINOIS DEPARTMENT OF TRANSPORTATION, Respondent. I, MIKE NGUYEN, state that I have read the foregoing transcript of the testimony given by me at my deposition on the 20th day of March, 2019, and that said transcript constitutes a true	2 3 4 5 6 7 8 9 10 11	were present at the taking of said deposition the appearances as hereinbefore noted. I further certify that I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action. IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my notarial seal this 2nd day of April, 2019. LISA HAHN PETERMAN, CSR, RMR
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EXHIBIT Q

Johns Manville vs. Illinois Department of Transportation

No. PCB 14-3

Steven L. Gobelman

02/07/2019

TRANSCRIPT AND WORD INDEX

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1 DEEO:	סך קער דוודאורים הרייי	Page 1	-			типпо	_
_	RE THE ILLINOIS POLLU	TITON CONTROL BOARD	1	MIMMINGS		INDEX	
2 In The Mat)	-	WITNESS			EXAMINATION
3 JOHNS MANY Corporation	VILLE, a Delaware on,)	-	STEVEN L.			
4 Comp	plainant,) PCB No. 14-3) (Citizen Suit)	4	Examination	n By Ms. B	rice	4
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8 Resp	pondent.)	8	Gobelman D	eposition	Exhibit	_
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1 APPEARANC	ES:		1			(Witness sworn	_
2			1 2			(Witness sworn VEN L. GOBELMA)	.)
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Page 5 Page 7 1 and now? 1 Deposition Exhibit 1. (Whereupon Gobelman Deposition No. 2 Have you been deposed since October 2, 2018? Exhibit No. 1 was marked for 3 3 identification.) Α. 4 Have you gained any other expertise relevant 5 BY MS. BRICE: 6 to this case since October 2, 2018? I just handed you Deposition Exhibit 1, Ο. which is dated November 7, 2018, "Expert Rebuttal Α. Nο And to the extent -- you were deposed 8 Supplemental Report of Steven Gobelman." Do you 9 October 2, 2018. You testified truthfully and recognize this document? 10 accurately to the extent you were able, correct? Α. Yes. 10 Α. Yes. And did you prepare this document? 11 Ο. 12 MS. BRICE: Okay. Just one thing, for the 12 Α. 13 record, that I just want to set out, we had requested Ο. Why did you decide to do a supplemental 14 from IDOT, MSG files with respect to a few e-mails 14 report? 15 between Mr. Gobelman and one of his colleagues, 15 When I reviewed Mr. Dorgan's rebuttal Mr. NEW-gen [phonetic.] 16 report, I believe it stated in there that I was -- the 17 THE WITNESS: NEW-win [phonetic.] 17 location of right of way 393 was incorrect in my 18 report. And so I looked back at my report and talked MS. BRICE: Is that how I --18 19 to my CAD person and -- and discovered that it was MR. McGINLEY: NEW-win. 2.0 MS. BRICE: NEW-win? 20 incorrectly placed. And so I needed to -- so I wanted MS. O'LAUGHLIN: We did this last time. 21 to fix it, make it accurate. 21 MR. McGINLEY: Like N-w-i-n. Was that brought to your attention by the 22 23 BY MS. BRICE: 23 AG's office, or did you come to that conclusion on 24 your own by reading the report? Nguyen. Okay. Can you spell that for her, 24 Page 6 Page 8 1 please? I came to it on my own from reading the Α. 2 report. MR. McGINLEY: It's N-g-u-y-e-n. MS. BRICE: And we've also requested various Okay. And Mr. Nguyen --3 Q. 4 documents in an e-mail. There's a whole bunch of them 5 that -- it was unclear whether or not the exhibits had -- is the CAD person you spoke with? 6 been -- exhibits to those documents or attachments to 6 7 those documents had been produced. And what did you say to him? So I just want to state, for the record, I asked him to relook at our base map and we're trying to resolve that, but we don't have those 9 redo the right of way legal description and -- and 10 confirm that on my base map it was accurately 10 for today's deposition. MS. CAISMAN: And then just really quick, Evan, I 11 depicted. 12 know we exchanged e-mails about the footnote in the And why was -- out of everything that was 13 objections where you talked about the range, and in 13 mentioned in Mr. Dorgan's report, why was that 14 Footnote 1 you say there are no documents for SG3900 14 something that you decided to check? 15 through 3999. Because I knew -- because it was an MR. McGINLEY: Right. 16 obvious -- something obvious because I had -- my MS. CAISMAN: And I think -- but I think there 17 intention was to accurately depict the right of way 18 might be a few pages missing outside of that range, 18 line on my report. And, to me, that would have been and I meant to give you the numbers. And I will --19 an obvious -- it wouldn't [sic] be something that 19 20 MR. McGINLEY: Please do. 20 somebody would dispute. So that concerned me that MS. CAISMAN: -- at a break. But I thought I had 21 something obvious was going to be in dispute, so I 22 sent you that e-mail. I think I forgot, so I 22 wanted to check to confirm that my map was accurate. 23 apologize. Was there anything obvious from Mr. Dorgan's MS. BRICE: I would like to mark this as 24 rebuttal report that you didn't check? 24

		Page 9	,, C		Page 11
1	A.	I don't understand what you're saying.	1	Α.	They thought it would be better to correct
2	Q.	Well, you said that you checked this one	2	the error	obvious error now than to wait and deal
3	thing bec	ause it was obvious to you that it could be	3	with it in	the hearing.
4	wrong. W	as there anything else from his report that	4	Q.	Who was that conversation with?
5	you thoug	ht you needed to go back and check?	5	Α.	Evan McGinley and Ellen.
6	A.	No.	6	Q.	Was Mr. Dougherty involved?
7	Q.	So you talked to Mr. Nguyen. When was that?	7	Α.	I don't remember if he was on the phone or
8	A.	It was probably like a day or so after I	8	not.	
9	received	the report. I don't have the day of	9	Q.	And what happened next?
10	memorized		10	Α.	I proceeded to fix the report.
11	MS.	BRICE: For the record, the report is dated	11	Q.	And what did you do to fix the report?
12	October 2	5, 2018.	12	Α.	Had the figures redone to properly depict
13	BY MS. BR	ICE:	13	the right	of way. And then, based upon those that
14	Q.	So you believe it was the 26th or the 27th?	14	fix, sort	of went through the report and evaluated
15	A.	Yeah, I didn't well, that's when it was	15	what neede	ed to be corrected based upon that change.
16	dated.	didn't necessarily get it then.	16	Q.	Was the AG I mean, I'm sorry.
17	Q.	Okay.	17		Was the was IDOT involved at all in the
18	A.	I mean, you know	18	decision o	on whether to do a supplemental report?
19	Q.	Shortly thereafter?	19	Α.	I have no idea.
20	A.	Yeah.	20	Q.	If you could, take a look at Exhibit 1 and
21	Q.	And was this in a phone conversation or in	21	turn to Pa	ge 1.
22	an e-mail	?	22		You say that a supplemental report was
23	A.	To who?	23	written, g	quote, to correct the location of Parcel 0393
24	Q.	Mr. Nguyen.	24	as shown o	on the base map created in the rebuttal cost
			_		
		Page 10			Page 12
1	Α.	Page 10 It was in a it was verbal.	1	report dat	Page 12 ed August 22, 2018, correct?
1 2	A. Q.		1 2		_
1 _		It was in a it was verbal.	-	Α.	ed August 22, 2018, correct?
2	Q. A.	It was in a it was verbal. And what did he report back to you?	2	Α.	Yes. Okay. And what document did you use to
3	Q. A.	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10	2	A. Q. let me bac	Yes. Okay. And what document did you use to
3	Q. A. feet nort	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be.	2 3 4 5	A. Q. let me bac	Yes. Okay. And what document did you use to
2 3 4 5	Q. A. feet nort	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail?	2 3 4 5	A. Q. let me bac	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the
2 3 4 5 6 7	Q. A. feet north	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation.	2 3 4 5 6	A. Q. let me bac that the O	Yes. Okay. And what document did you use to ck up. How did Mr. Nguyen determine that the 1393 had been misplaced?
2 3 4 5 6 7	Q. A. feet nort	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation.	2 3 4 5 6 7 8	A. Q. let me bac that the 0 A. the plat o	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to
2 3 4 5 6 7 8	Q. A. feet norti Q. A. Q. you do? A.	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did	2 3 4 5 6 7 8	A. Q. let me bac that the 0 A. the plat o	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings
2 3 4 5 6 7 8	Q. A. feet nort. Q. A. Q. you do? A. them know	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let	2 3 4 5 6 7 8 9	A. Q. let me bac that the 0 A. the plat of	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it.
2 3 4 5 6 7 8 9	Q. A. feet nort: Q. A. Q. you do? A. them know wanted to	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and	2 3 4 5 6 7 8 9 10	A. Q. let me bac that the 0 A. the plat of and offset Q. you were r	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you
2 3 4 5 6 7 8 9 10	Q. A. feet nort. Q. A. Q. you do? A. them know wanted to whether I	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and know how they wanted me to handle it,	2 3 4 5 6 7 8 9 10	A. Q. let me bac that the 0 A. the plat of and offset Q. you were r	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you referencing some documents. What part of
2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q. A. Q. you do? A. them know wanted to whether I and correct	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and know how they wanted me to handle it, needed to redo a supp redo the report	2 3 4 5 6 7 8 9 10 11	A. Q. let me bac that the 0 A. the plat of and offset Q. you were r	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you eferencing some documents. What part of
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A. feet nort: Q. A. Q. you do? A. them know wanted to whether I and corresomething hearing. Q. A.	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and know how they wanted me to handle it, needed to redo a supp redo the report of the error or whether or not this was that would just be fixed in the the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. let me bac that the 0 A. the plat of and offset Q. you were r your depos A. Q. A. Q. which he r	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you referencing some documents. What part of sition is that? It's the I mean "deposition," I'm sorry, report? Appendix C. Okay. So Appendix C was the basis upon
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. feet nort: Q. A. Q. you do? A. them know wanted to whether I and corresomething hearing. Q. A. just told	And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and know how they wanted me to handle it, needed to redo a supp redo the report of the error or whether or not this was that would just be fixed in the the And what did they tell you? They thought about it and got back to me and me that they thought it would be best if I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. let me bac that the 0 A. the plat o and offset Q. you were r your depos A. Q. A. Q. which he r	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you referencing some documents. What part of sition is that? It's the I mean "deposition," I'm sorry, report? Appendix C. Okay. So Appendix C was the basis upon replotted 0393? Yes. Is there anything else that he used to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. feet nort: Q. A. Q. you do? A. them know wanted to whether I and corresomething hearing. Q. A. just told submitted	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and know how they wanted me to handle it, needed to redo a supp redo the report of the error or whether or not this was that would just be fixed in the the And what did they tell you? They thought about it and got back to me and me that they thought it would be best if I a supplemental report.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. let me bac that the 0 A. the plat o and offset Q. you were r your depos A. Q. which he r A. Q. replot 039	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you referencing some documents. What part of sition is that? It's the I mean "deposition," I'm sorry, report? Appendix C. Okay. So Appendix C was the basis upon replotted 0393? Yes. Is there anything else that he used to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. feet nort: Q. A. Q. you do? A. them know wanted to whether I and corre something hearing. Q. A. just told submitted Q.	It was in a it was verbal. And what did he report back to you? He said that the the right of way was 10 h than what it should be. And was that a conversation or in an e-mail? It was a conversation. Okay. And after he told you that, what did After that I called the AG's office to let that there was a problem with my report and know how they wanted me to handle it, needed to redo a supp redo the report of the error or whether or not this was that would just be fixed in the the And what did they tell you? They thought about it and got back to me and me that they thought it would be best if I a supplemental report.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. let me back that the 0 A. the plat of and offset Q. you were r your depose A. Q. A. Q. which he r A. Q. replot 039 A.	Yes. Okay. And what document did you use to ek up. How did Mr. Nguyen determine that the 1393 had been misplaced? He went back, based upon my direction, to of highways and the location with bearings as and sort of redid it. Okay. So based upon if you can you referencing some documents. What part of sition is that? It's the I mean "deposition," I'm sorry, report? Appendix C. Okay. So Appendix C was the basis upon replotted 0393? Yes. Is there anything else that he used to
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Page 13 Page 15 So you agree that it was incorrectly placed I refer to it in my paragraph. 2 at that time in your August 22 --Ο. You don't cite a -- "sheets (2)," is that Yes. 3 what you're saying? 3 -- 2018 report? "As-build plans Page 23 and 24." Q. Α. Okay. And what expertise are you relying on But that's not what you're talking about in 5 Ο. 6 with respect to making this change? 6 the next section. You say -- that's for the previous I'm relying on the accuracy of the plat of 7 paragraph. So your answer is the Page 23 and 24 are 8 highway. 8 what you were relying on with respect to the Right, but "expertise" because Mr. Nguyen 9 stationing on Greenwood Avenue? 10 was the one who actually did the plotting, correct? I'm confused because I only see one He's the person in CAD that did the work, 11 paragraph. 11 12 yes. Ο. All right. Can you tell me, in this Right. So -- and you don't have a license 13 sentence, "The 1971 plan sheets," with a reference to 14 in CAD, correct? 14 "2," which references, I can tell you, to the entire 15 A. Correct. 15 set of plans... So is there any expertise that you are Α. Uh-huh. 16 16 17 relying on in making this change that you personally Ο. -- "show that IDOT stationing 7+00 on 18 have? 18 Greenwood is at the eastern edge of Parcel 0393." A. I'm just trying to know if there's a 19 No. 20 Was there anyone else at Atwell involved in 20 particular page you're referencing there, if you know, 21 making the change? 21 if you don't know? MR. McGINLEY: Objection, facts --MR. McGINLEY: Objection, asked and answered. 2.2 22 23 MS. CAISMAN: You said "Atwell." THE WITNESS: I believe I'm referring to the MR. McGINLEY: -- not in --24 pages that I've referred to in the early part of that 24 Page 14 Page 16 MS. BRICE: Sorry. I know. I'm sorry. 1 paragraph, Pages 23 and 24. 1 2 BY MS. BRICE: 2 BY MS. BRICE: Okay. In those plans -- and I'm not Let me start again. Q. Was anyone else at your current firm, 4 speaking specifically about Pages 23 and 24, I'm 5 Andrews, involved in making the change? 5 referring to the plans -- the IDOT as-build plans, you 6 know what I'm talking about -- from 1971? Α. Okay. You say here, on Page 1 of Exhibit 1, Α. Yes. 8 that -- down here under Section 2.1, that, "The 1971 Okay. Where do those plans place the 8 Ο. 9 plan sheets show that IDOT stationing 7." -- or "7+0 9 stations along Greenwood, on the north south of 10 Greenwood, the south side of Greenwood, or in the 10 on Greenwood Avenue is at the eastern edge of 11 Parcel 0393." Why is this significant? 11 middle of Greenwood? It's a -- it's just a reference on the --The stationing is always typically depicted 12 13 how things are tied together in the viewing of the 13 on the center line of the road. 14 figures. I mean, now Station 7 is an indicator and --Ο. And why is that? 14 15 that where the end of the embankment was it ties in It's just easier to view. I mean, sometimes 16 the end of the right of way so that -- that they're 16 the stationing is edge of pavement, but then it's --17 all -- have to be all in alignment. 17 then it's just called out differently. But it's Do you know which document in the plans 18 just -- the typical is always center line so everybody 19 you're referring to here showing Section 7, where the 19 knows what the stationing is lined up as. 20 placement of 7... Okay. And do you recall that being the case I don't understand what you mean "which"... 21 21 here with respect to those plans? Sorry. Well, there -- the -- you reference I don't recall, but I would assume that it 23 here the whole set of plans. Is there one particular 23 is. 24 page in the plans that you were referring to here? You say here that Parcel 0393 begins at the Q. 24

Page 19 Page 17 1 intersection of the easterly line of Pershing, former I didn't e-mail it to anybody. 2 Sand Street, and the line -- and the south line of Okay. Did you ever send it electronically 3 Greenwood Avenue. Do you see that? to someone? No, I don't believe so. Α. Okay. Does it continue along the south line Okay. If --Ο. 5 6 of Greenwood Avenue going east? Well, I take that back. I sent it electronically to my admin to -- to finalize, if Α. Say that again. Does it continue along the south line of 8 that's what you're getting at. Greenwood as it moves east? What did your admin do? Does what? I don't understand what you're They checked formatting, they put the cover 10 10 11 referring to. I lost you. 11 page together, you know. Parcel 0393. 12 Ο. Ο. Okay. Α. End. Α. They may -- if they read through it, they 13 Q. No. So what does it do? 14 may -- if they find a grammatical error, they may, you 14 15 It ends. 15 know, fix it or suggest a fix for it. Sure. But it -- at some point, but it Q. Okay. Did you produce a copy of what you 16 17 starts, and then does it -- does it move up, does it 17 sent to the admin? 18 move down, or does it continue going along the south It's changed on top of each other. It Α. 19 doesn't -- there isn't a set copy. side -- south line of Greenwood Avenue until it ends? 2.0 MR. McGINLEY: Objection, compound, vague and Well, there's a -- there's a file that was 21 ambiguous. 21 sent --22 BY MS. BRICE: Right. 22 Α. 23 Okay. Let me start over again. Ο. -- electronically, so I would assume you You have this sentence. Okay? All I'm 24 could open that file and print it out? 24 Page 18 Page 20 1 asking is this: You say it that it begins at the It's the -- it would be this document, it's 2 just track-changed on top of it and saved on top of 2 easterly line of Pershing and Sand and then it goes 3 along the south line of Greenwood Avenue. Okay? 3 it. It wasn't saved as a draft. It wasn't saved as a Correct. 4 separate copy. Okay. Does it continue along the south line Okay. Did you show a supp- -- a draft of 6 of Greenwood Avenue in a horizontal direction until it 6 the supplemental report to the AG's office? I don't remember at this time. I suspect we 7 ends? 8 talked about it and went through it. 8 Α. Yes. Okay. Did you do any drafts of the How would -- how did you go through it? Ο. 10 supplemental report? I believe we did it over a phone call. Α. Α. No. Q. Okay. And how did that transpire? What did 11 So this document right here, Exhibit 1, is 12 you talk through? 12 13 the only document you ever printed out with respect The layout of what I did. 13 Α. 14 the supplemental report or e-mailed to anyone with Ο. Okay. And did they have any comments? 14 15 respect to the supplemental report? Α. I don't recall whether or not they had any 15 16 comments or not. Α. Yes. So no changes were made by anybody with Did they have any suggestions as to things 17 18 respect to this document in a draft form? 18 you should cover or not cover? There was never a paper draft form. There No. 19 Α. 19 20 was -- there was a... Did you do any drafts of the figures that 20 Q. 21 are contained in this Exhibit 1? And -- I mean, I just said that. Did you Ο. 22 ever e-mail it to --They were just that same approach. They're 23 Well, I didn't --23 just done over top of each other. The same PDF is -- somebody? 24 copied on top of the other PDF. 24

Page 21 Page 23 Okay. So there's no other figures other 1 just the whole Paragraph 3. 2 than the ones that are contained in your Exhibit 1; is "I then re-examined the placement of the 3 that your testimony? 3 right of way to Parcel 0393 on the base map" -- "base I'm pretty positive that that would 4 map I created and realized, during the process of 5 be the -- there's figures from -- I mean, even the 5 placing the northern boundary of Site 3 to the 6 figures that are in -- that we produced from the first 6 existing fence line and trying to line everything up, 7 version are just -- are now looking like these figures 7 I did not make sure the location of the line for the 8 because those figures are just overlaid. 8 right of way to Parcel 0393 was set. As a result, on Sorry. I'm not understanding, "from the 9 the base map, the right of way of Parcel 0393 was 10 first version"? 10 incorrectly pushed approximately 10 feet to the Α. Well, the first expert rebuttal --11 north." 11 12 Ο. Okav. 12 Q. Okay. I have a couple questions about that 13 paragraph. Α. -- figures. 13 So between the first expert rebuttal figures The base map was done by Mr. Nguyen in CAD, 14 15 correct? 15 and the figures you have here, you didn't create any 16 other figures? It was created in CAD, yes. 16 A. 17 Α. No. 17 And he was the person who did all of the 18 work to put it into CAD and to create the base map, Does your August 22nd report and this 18 19 supplemental report contain all the opinions you're 19 correct? going to be offering at hearing? 20 Correct. At this time, yes. You said that, During the process of placing 21 (Whereupon Gobelman Deposition 22 the northern boundary of Site 3 to the existing fence 2.2 23 Exhibit No. 2 was marked for 23 line, in trying to line everything up, I did not make identification.) 24 sure the line of the right of way to Parcel 0393 was 24 Page 22 Page 24 1 BY MS. BRICE: 1 set. Mr. Gobelman, I'm handing you what's been 2 What process are you talking about here? 3 noted as Deposition Exhibit 2. Can you tell me what MR. McGINLEY: Just for the record I don't think 4 this is? 4 you actually read that into the record correctly. You It's an affidavit. 5 missed a couple words. IDOT drafted this affidavit -- or the AG's MS. BRICE: Oh, I'm sorry. Okay. Fine. 7 office drafted the affidavit, correct? 7 BY MS. BRICE: Correct. Paragraph 3, the process, what process are 8 Α. Ο. Did you make any revisions to it before you 9 you talking about? Ο. 10 signed it? The process of when we were trying to --There may have been some just wording 11 when I was trying settle on what the base map was 11 12 changes to it, yes. 12 going to look like. Okay. And how were those communicated? Q. Okay. And how does the fence line come into 13 Ο. 14 play now because you had an opinion about a fence in Over the phone. Α. 14 Can you tell me what wording changes were 15 your first report? We'll go into that later, but how 15 Ο. 16 does that -- what is your opinion on the fence line 16 made? No, I can't. 17 17 now? A. Well, the -- I think the fence line still

18 Q. You have no memory of anything that was

19 changed?

I don't recall what was changed. 20

Ο. Okay. If you can take a look at 21

22 Paragraph 3, please.

23 Okay.

Can you read that into the record, please, 24

So the northern boundary of Site 3 is still 23 the fence line?

20 right word, but it still depicts the -- the area that

19 accurately it -- you know, "accurately" is not the

Α. 24

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Q. Okay. That's what you testified to in your

- 2 last deposition, so I'm trying to --
- A. Right.
- 4 Q. -- understand it. So that's not your
- 5 opinion anymore?
- 6 A. No. The northern boundary of Site 3 is --
- $7\,$ was always the -- the right of way line, and that's
- $\ensuremath{\mathbf{g}}$ why it got accidently shifted to the north of the
- 9 fence line.
- 10 Q. It was always the right of way line, that's
- 11 always been your position?
- 12 A. That's the way everything was measured off
- 13 of.
- Q. Okay. I'm asking about your opinion. Has
- 15 your opinion always been that it was -- the northern
- 16 boundary of Site 3 was the right of way line?
- 17 A. Yeah.
- Q. Despite what you say in your initial report?
- 19 A. In my initial report, I -- I said I -- I use
- 20 the fence line to depict the area of Site 3.
- Q. Okay. All right. So is the -- let's
- 22 mark -- well, you know what, I'm going to come back to
- 23 that.
- 24

2

Page 26

- MS. BRICE: Let's mark this as Deposition 3.
 - (Whereupon Gobelman Deposition
- 3 Exhibit No. 3 was marked for
- 4 identification.)
- 5 BY MS. BRICE:
- Q. I've handed you Deposition Exhibit 3, which
- 7 is your initial expert rebuttal report, is that
- 8 correct?
- 9 A. Yes.
- 10 Q. And do you --
- 11 MS. BRICE: There's not a Bates number on there,
- 12 is there?
- 13 MR. McGINLEY: No.
- 14 MS. BRICE: Okay.
- MR. McGINLEY: We never produced one with a Bates
- 16 number.
- 17 BY MS. BRICE:
- 18 Q. If you could turn to -- can you tell me what
- 19 in your supplemental report is different about your
- 20 initial report?
- 21 A. The only difference is is -- was the
- 22 movement of the right of way 10 feet to the north and
- 23 the subsequent changes of the allocations.
- Q. Okay. So let's take a look through this

- 1 initial report, if you would, please.
- I assume then that, you know, Sections 1 and
- 3 2 and 3 and 4 of this initial report, which are
- 4 purpose and summary qualifications, background
- 5 information, project management and reasonableness of
- $\ensuremath{\text{6}}$ implementation costs, are all still the -- still your
- 7 opinion -- still contained in this initial report?
- A. Yes, it didn't in change my evaluation.
- Q. Okay. Section 5.1 of your initial report,
- 10 is this -- still contain your opinion?
- 1 A. I don't know. I'd have to look at the other
- 12 report to see if there was a Section 5.1 of what was
- 13 changed in it.
- Q. Well, you have it in -- it's Exhibit 1 in
- 15 front of you.
- A. Well, 5.1 in -- in the supplemental report
- 17 is 2.1, so that's what the changes were made.
- [8 Q. Okay. But 5.1 is, you know, 1, 2 1/2 pages
- 19 in your initial report, and it's one paragraph in your
- 20 supplemental report. So I'm trying to find out what
- 21 part of 5.1 in your initial report is still your
- 22 opinion?
- 23 A. It's -- it's -- the information on 5.1 is
- 24 still my -- is still my opinion except what was

Page 28

- 1 changed in 2.1.
- O. Okay. Except for the location of 0393?
- 3 A. Yes.
- Q. Okay. 5.2 and 5.3 in your initial report
- 5 are the areas of liability. Are these opinions
- 6 contained in your initial report, 5.2 and 5.3, still
- 7 valid and still your opinions?
- 8 A. Yes.
- 9 Q. I assume the same is true for 6, which is
- 10 the attribution approach, is that correct?
- 1 A. The approach is still the same, yes.
- 12 Q. Correct. And then 6.1, Nicor gas; 6.2; 6.3,
- 13 which has subpoints; 6.4; 6.5, which has subpoints;
- 14 and 6.6; 6.7, which has subpoints; 6.8; 6.9, which has
- 15 subpoints; 6.10 and -- which has subpoints; and 6.11,
- 16 which has subpoints; and 6.12, which has subpoints;
- 17 6.13, I believe, are -- are they all still your
- 18 opinion as well? I know the costs have changed, but
- 19 other than that, do those all contain your opinions?
- 20 A. Yes.
- Q. Okay. And on Section 7, obviously, the
- 22 numbers have changed in your report?
- 23 A. Correct.
- Q. Okay. And Section 8 is just different

- 1 because of the number, the number is different, is
- 2 that right, it's now \$600,000 instead of 489?
- So the supplemental report focuses on the
- 5 location of 0393, which we have discussed.
- Are you now 100 percent certain that you
- 7 have the location correct?
- Yes.
- And you have -- your figures have changed in
- 10 your supplemental report. How have they changed?
- The areas impacted, associated with the 11
- 12 change in the northern boundary of Site 3, have
- 13 changed associated with that different allocations.
- Okay. But the maps themselves, what's 14
- 15 different on the maps?
- Oh, I think, actually, there's a better, 16
- 17 cleaner figure of the Google image than it was before.
- Okav. Ο.
- I think it's the same year, but it was $% \left(1\right) =\left(1\right) \left(1\right)$
- 20 just a -- found that they -- it was a better image
- 21 that we found.

1 maps?

- Okay. Other than that, and changing the 2.2
- 23 location of 0393, which I think you said impacts the
- 24 northern boundary, did you change anything else on the
 - Page 30
 - 1 report. Do you know why?

 - So you're -- are you 100 percent certain
- 4 that Figures 1.8 -- Figures 1 through 8 contained in
- 5 the supplemental report are correct?
- Α.

A. No.

- Are the features and boundaries on those Ο.
- 8 approximations, or are they exact?
- What do you mean by "features" and the Α.
- 10 "boundaries"?
- The boundaries of 0393, the boundaries of
- 12 Site 3, the boundaries of Site 6, the location of the
- 13 waterline, the location of all the North Shore Gas,
- 14 the AT&T, the northeast excavation, all of those
- 15 things?
- MR. McGINLEY: You know, I'm going to object. I
- 17 think, if you want to ask him questions about the
- 18 locations of things that are represented on the
- 19 figures, I mean, perhaps, it would make more sense to
- 20 just put the figures in front of him and then ask the
- 21 questions rather than just going sort of scatter-shot
- 22 through them.
- 23 MS. BRICE: Sure. I'm just asking him if they're
- 24 approximations, not -- you know, it's -- and what he

- 1 recalls, if he knows that they're -- if he thinks
- 2 they're approximations or if he thinks that they're
- 3 exact locations.
- THE WITNESS: Their locations were based upon
- 5 information that I had, that I wouldn't necessarily
- 6 consider that potentially exact locations, but it's
- 7 based upon previous reports and -- and their
- 8 locations.
- 9 BY MS. BRICE:
- Okay. Is there -- is there a -- could they
- 11 be off by a certain number of feet? Is that a
- 12 possibility?
- MR. McGINLEY: Objection, vague and ambiguous.
- THE WITNESS: I have no idea. I mean, all I did
- 15 was accurately --
- 16 BY MS. BRICE:
- 17 O. So it's possible?
 - All I did was accurately produce the
- 19 locations of things based upon the previous reports
- 20 and their information.
- Okay. So it's possible that your figure is
- 22 off somewhat?
- 23 Α. It's also possible that it is accurate.
 - There's no Exhibit 1 in your supplemental Ο.
 - Page 32

Page 31

- I believe Exhibit 1 in the original report
- 3 had no changes to it.
- So Exhibit 1 in the original report is still
- 5 valid in your mind?
- Α. 6
- In our first deposition, we talked about how Ο.
- 8 you need a point of reference to create an accurate
- 9 map, right?
- Α. Okay. I don't remember.
- Q. Okay. But is that true?
- Α. 12
- What points of references did you use in 13
- 14 creating your base map in your supplemental report?
- Well, I used the original base map that I
- 16 had and -- and only looked at the right of way
- 17 depicted on the highway plats and -- and that's -- and
- 18 created it off of that.
 - Okay. So your testimony in your first
- 20 deposition about the reference points that were used
- 21 hasn't changed?
 - A. No, I don't believe so.
- Can you turn to Figure 1 of Exhibit 1, 23
- 24 please, and can you tell me what this is?

- A. It is the Site 3 and Site 6 base map.
- Q. And this is the revised base map, correct?
- A. Correct.

1

- 4 Q. And I notice that you have State plane
- 5 coordinates on this map. How were they used here?
- 6 A. They were the reference points that we had
- 7 in the previous, and I think the other supplemental, I
- 8 think, figures had State plane grids on them, also.
- 9 Q. Okay. And do you know how these State plane
- 10 coordinate locations, vis-a-vis Site 3 and Site 6,
- 11 align with respect to the AECOM final report State
- 12 plane coordinates?
- 13 A. I'm not sure. I would assume they would be
- 14 the same.
- 15 Q. Okay. Did you check to see if they were the
- 16 same with any of the other reports in the record?
- 17 A. I believe we did.
- 18 Q. Okay. Did you --
- 19 A. Well --
- 20 Q. -- personally?
- 21 A. I looked at the State planes and the
- 22 numbers, yes.
- Q. Okay. But did you personally go into CAD
- 24 and try and align everything?

Page 34

- 1 A. No.
- O. Who did that?
- A. My CAD operator, Mike Nguyen.
- ${\tt Q.}\,{\tt Okay.}\,$ And what reports did you look at to
- 5 see that everything lined up with the State plane
- 6 coordinates?
- ${\bf 7}$ $\,$ $\,$ A. The -- the reports that were referenced in
- 8 my original supplemental -- in my original report, not
- 9 the supplemental.
- 10 Q. So do you recall which ones those are, as
- 11 you sit here?
- 12 A. No, I don't recall.
- 13 Q. Okay. Is it your testimony that you looked
- 14 at every single one of those and compared them to see
- 15 that the State plane coordinates matched up with
- 16 respect to Gobelman Figure 1 in your supplemental
- 17 report?
- 18 MR. McGINLEY: Objection, vague and ambiguous.
- 19 THE WITNESS: I -- I can't say that I looked at
- 20 every single State plane coordinate grid that was
- 21 located in every single report and compared them to
- 22 each other.
- 23 BY MS. BRICE:
- Q. Yeah, that -- that's not what I said.

- You said that there were reports that you
- 2 referenced in your initial report, which was the
- 3 August 22 report, correct?
- A. Correct.
- 5 Q. Did you go back to those reports and compare
- 6 the State plane coordinate locations in those reports
- 7 that you used to create that base map with the State
- 8 plane coordinates you have here?
- 9 A. No
- 10 Q. Why not?
- 11 A. Because they're the same State plane
- 12 coordinates that we originally used in the original
- 13 report.

15

- Q. But the original report was not correct?
 - A. Only as it relates to the location of the
- 16 right of way at 0393.
- Q. What source are you using to say that 0393
- 18 aligns with the northern boundary of Site 3?
- 19 MR. McGINLEY: Objection, lacks foundation.
- 20 BY MS. BRICE:
- Q. Okay. If you take a look at Gobelman
- 22 Figure 1, are you saying that the northern boundary of
- 23 Site 3 is the same as the northern boundary of
- 24 Parcel 0393 right of way at least on the eastern edge

Page 36

- 1 of Site 3?
- A. 0393 -- the northern boundary of 0393 is --
- 3 is the boundary that is created because Commonwealth
- 4 Edison owns the property to the south and highway --
- 5 whether it's IDOT or Winnebago or whoever owns the
- 6 highway right of way to the north, and that -- that's
- 7 the line of a boundary. All the other reports use
- 8 that line as a demarcation of Site 3.
- 9 Q. What other reports?
- O A. The other -- the AECOM reports and that
- 11 everything was measured off a line separating to the
- 12 north. And that line is the -- the property line, and
- 13 that's what that line depicts is the property line
- 14 between highway and -- and Commonwealth Edison.
- 15 Q. Okay. So just here on Figure 1 you've got a
- 16 dashed line at the top of Site 3. Do you see that?
- 17 A. I'm not sure what you're referring to.
- 18 Which dashed line?
- 19 Q. This dashed line (indicating.)
- 20 A. Which --
- Q. Here, I'll circle it for you. I'm circling
- 22 what I'm talking about, that line right there
- 23 (indicating.)
- 24 A. The dark -- the dark dashed line?

Page 37 1 BY MS. BRICE: The line that has been circled, the dark 2 dashed line that has been circled. Do you see that? How do you ensure, with a Google image, that I see two lines that you have circled. 3 the State plane coordinates are placed in the right I have a line -- I have drawn in pink the 5 line I'm talking about (indicating.) Okay? It's in -- the CAD has the Google image and 6 the State plane coordinates. It's an earth thing. Q. What is that depicting? 7 You know, the State plane coordinates are everywhere, That is depicting the right of way, the 8 so it's just -- it just lays. It's like latitude to 9 northern right of way line. longitude. It's just there in a known position on the Okay. What else is it depicting? Is it image, on the aerial. 11 depicting the northern boundary of Site 3; yes or no? Ο. Okay. Do you know what height the Google 12 image was taken from? 13 Again, you're using -- you said earlier that 13 Α. No, I do not. 14 you're using a different Google image, correct, for Do you know what angle it was taken from? 14 15 these figures? 15 No, I do not. Yeah, it's a different -- yeah. Q. Does it show topography at all? 16 16 17 Okay. And why is that? 17 You can pick out some topography off of it, 18 but it doesn't show clear topography. It just -- when we were putting together 18 19 these figures, my CAD person, Mike Nguyen, said, hey, And do you know what degree of focus was 20 there's this cleaner image than -- than the image that 2.0 used in this aerial image? 21 we were using. And I said, well, let's use the 21 22 cleaner image to make it look cleaner. MS. BRICE: Can we take two minutes? 22 Does this cleaner image, as you say, have 23 MR. McGINLEY: Sure. Absolutely. 24 any impact on what is depicted on the map? (Short recess.) Page 38 1 BY MS. BRICE: Α. 1 Can we go back to your affidavit, which, I How did you get your grid to superimpose 3 onto this aerial image? MR. McGINLEY: Objection, vague and ambiguous, 5 assumes facts not in evidence. 6 BY MS. BRICE: Okay. You placed a grid -- or Mr. Nguyen 7 Site 3 and the borings in Site 3, shifted 8 placed a grid upon this image, correct? Correct. 9 Α. Okay. How did he do that? 10 Q. 10 Q. I believe he did it because it's in CAD. 11 of 0393? 12 State plane coordinates are all in the system. Okay. Did he use a -- does the Google image 13 14 have a reference point? 15 MR. McGINLEY: Objection, vague and ambiguous.

THE WITNESS: I don't understand what you mean by

Is there a reference point that you can use

17 the Google image having a "reference point."

MR. McGINLEY: Same objection.

20 to -- with the CAD for this Google image to make sure

21 everything aligns and that those are superimposed in

18 BY MS. BRICE:

22 the right place?

19

23

24

3 think, was 2, and the last sentence of Paragraph 4, 4 which is on the second page, "By correcting the 5 placement of the right of way line, the depiction of 6 the site layout, including the northern boundary of 8 approximately 10 feet south"; do you see that? Okay. So you changed more than the boundary Well, I stated the -- everything is tied to 13 what is the boundary of -- the northern boundary of 14 Site 3, and that's -- so, therefore, when that 15 boundary gets shifted down, because the right of way 16 was in the wrong spot, the borings in Site 3 are tied 17 to that distance coming off of that northern boundary. Okay. So you changed more than the boundary 19 of 0393? Α. Yes. Okay. Can you explain to me why changing 22 0393 required you to move the northern boundary of 23 Site 3 and the boring locations 10 feet south? When -- everything was tied to a -- a

Page 39

Page $4\overline{0}$

Page 41 Page 43 1 perceived northern boundary of Site 3, and everything THE WITNESS: It changed because of the right of 2 is measured off that, and it's measured off of that 2 way line moved 10 feet south, so I reproduced that 3 right of way line. So when it got inadvertently moved 3 figure again showing the -- what the current -- the 4 north, then -- then the fence line became the northern 4 layout is. 5 boundary of Site 3 in the original report and 5 BY MS. BRICE: 6 everything was measured off of that line. Q. Okay. But you're comparing a number of So when the right of way then gets shifted different reports to one another, correct? 8 south, those borings and the northeast excavation, It's comparing, basically, what was in the 9 everything that is tied to it -- was tied to that line 9 original report as Exhibit 1, which compared all the 10 different layouts of -- of Site 3, and then Site 2 --10 moved south with it. Ο. Okay. What was tied to that line? 11 or Exhibit 2, basically, just puts my area of Site 3 11 Everything that was in Site 3. 12 on that map showing how it all compares. 12 And what do you mean by "everything"? Okay. What are you -- what are you trying 13 Well, the -- the borings that are located --14 to show us in this map right here? 14 15 the -- that were depicted in the figure, the northeast I'm showing you that -- that Exhibit 2 in 16 excavation that was tied to the northern boundary of 16 the original report has changed. 17 Site 3. And then -- what then gets changed is the Ο. Okay. And what -- what is this supposed to 18 allocations of the amount of what distances that 18 be telling us? 19 things ran, where -- where impacts come and go of the That -- that it has changed, and I have Α. 20 allocations of the -- the utility lines that go 20 shifted the right of way line 10 feet to the south. 21 through there, that -- the distances that --Okay. What is your opinion related to 22 Okav. 22 Exhibit 2? Do you have any opinions at all relating 23 to Exhibit 2? 23 Α. -- then are changed. Did the utility lines shift, too? I was just showing how the different layouts 24 Page 42 Page 44 1 lay together, including mine. 1 Α. No? The Waukegan waterline didn't shift? 0. Okay. So your opinion is that these are now 3 the layouts as compared to the opinion that you had in No. And why didn't those shift? 4 your previous report that had the layouts in a Because they were tied to something else. 5 different place? 6 They were just -- they were laid in as -- as not tied MR. McGINLEY: Objection, misstates the witness's 6 7 to the boundary, they were just -- they're laid into 7 testimony. 8 the site. THE WITNESS: What I'm depicting in Exhibit 1 was Q. On Figure -- if you can go back to Figure --9 that -- in the initial process of putting the report 10 together, that multiple Figure 3s, areas of Figure --10 go back to your report. MR. McGINLEY: Which? Exhibit 1 or 3? 11 that showed Figure 3, didn't line up together and 11 MS. BRICE: The -- 1. 12 that, for my comfort, and -- and able to allocate what 12 13 BY MS. BRICE: 13 I would -- correctly would be to create a -- my own Q. I think, if you turn to the back of this 14 base map instead of using somebody else's to depict 15 report, there's an exhibit EX-2 somewhere in the 15 the allocations appropriately, and that hasn't 16 appendices. I think it might be B. Do you see this? 16 changed. 17 BY MS. BRICE: 17 A. Okay. And what is this? 18 Okay. But this map is now showing that It was the Exhibit 2 that was in the 19 the -- let's just take an example. The red line, 20 original report showing the -- what was changed 20 which is Weaver Consultants line, and the green line, 21 which is AECOM's line, and your black dotted line 21 because it -- since it changed what the -- the right 22 of way line moving 10 feet south --22 pretty much line up, correct? 23 (Short interruption by the court They're pretty close, yes. 23 reporter.) Okay. But they weren't in the first report, 24

Page 45 Page 47 1 were they? -- maybe you were trying to trick me. The -- yes, because the north boundary got No, I'm not trying to trick you. For the 3 shifted to the -- was shifted 10 feet to the north. 3 record, I think they're the same. Okay. So this is a new opinion of yours in Yes, they appear to be the same. 5 this report? Ο. Okav. Great. So then let's just set this 6 aside and use the ones in your opinion report, okay, I don't take it as an opinion, I take it 7 that's what my new area is because the right of way 7 because this is -- I know is the final report, so I 8 line got shifted to the north incorrectly in the 8 want to be working off the same stuff. I just wanted original report. 9 to make sure that that was -- wasn't something Okay. So is it your position that you have 10 different. Okay. 11 no new opinions in your supplemental report? So we're back to Exhibit 1, and I'd like to 12 know when these figures were created. There's --Well, my opinion in the supplemental report 13 is that that is -- the Site 3 that I created is --13 there's the Exhibit 2 in Appendix B, and then there Okay. 14 are a number of figures. And this is what I'm 14 15 -- is Site 3. 15 referencing. I think it's 1 through 8 attached at More general: What are your new opinions in 16 exhib- -- in figures, and I'm wondering when these 16 17 your supplemental report? 17 were created. I don't think there are any new opinions. They were originally created in the first Α. 19 It's just correcting my base map to be accurate and --19 rebuttal report. 20 and making the allocations then as accurate as This version, when this was version created? 21 possible based upon that shift. Shortly after discussions with the AG saying 22 (Whereupon Gobelman Deposition 22 that I should create a supplemental report. Exhibit No. 4 was marked for 23 And Mr. Nguyen put these together, I take identification.) 24 it? 24 Page 46 Page 48 1 BY MS. BRICE: Upon my direction, yes. Α. 1 Whose decision was it to create new figures? I'm handing you what has been marked as Ο. 3 Exhibit 4. And the Bates numbers are --Α. Mine MR. McGINLEY: It's right underneath. It's Ο. Okay. And who looked at them before they 5 SG003866 through 3874. went into your final report, this version? MS. BRICE: Thank you. Me. Α. MR. McGINLEY: Sure. Ο. Mr. Nguyen? 8 BY MS. BRICE: Α. Well, he produced them. I mean, he created Mr. Gobelman, here's my question: Are these 9 them, yes. Did the AG's office see the figures before 10 the same -- these were produced to us separately. Q. Are these the same figures that are 11 you had them inside your final report or contained 11 12 contained in your final expert report? 12 within the final report? I have to look at them and compare them. Α. No. 13 13 That's okay. You can do that. Ο. Did the IDOT --14 14 15 (Brief pause.) 15 Α. No. 16 BY MS. BRICE: Q. -- see them? And it's not a trick question. They appear 17 17 18 to be the same to me. Okay. So let's take Gobelman Figure 1. Can 18 That was my original thought, too, but then 19 you please turn to Gobelman Figure 1? 19 20 I was like, okay, that's --Okav. 20 Α. No, no, no. You should -- you should look. Q. And how did you plot these b. borings on 21 22 I want you to be --22 this map? 23 I was like, well --They're -- the original location was plotted -- for sure. 24 in the original rebuttal report. 24

- Q. And what documents did you use to base the belowings off of?
- ${\tt 3}$ ${\tt A.}$ It's whatever -- how I ever referenced it in
- 4 that report.
- 5 Q. Okay. And so I assume --
- 6 A. I think it was off one of the -- ERM or one
- 7 of their -- some of those reports that had
- 8 the original locations of those borings.
- 9 Q. Okay. So you assumed that that document
- 10 that you referenced in your initial report was correct
- 11 when you created the locations for these borings?
- 12 A. Yes.
- Q. Did you verify these boring locations with
- 14 any other source?
- 15 A. I did not verify those borings in creating
- 16 the supplemental report.
- Q. So you didn't look at where AECOM had these
- 18 borings located on Site 3 --
- 19 A. Not in -- not in regards of creating the
- 20 supplemental report.
- Q. How about in -- with regards to creating the
- 22 original report?
- 23 A. I looked at a bunch of the reports and
- 24 locations. I looked at the ones that had -- gave me

Page 50

- 1 actual measured -- measurements that I could use to
- 2 properly mark them.
- ${\tt Q.}\,{\tt Okay.}\,{\tt So}$ do these boring locations on
- 4 Gobelman Figure 1 align with those contained in the
- 5 AECOM final report?
- 6 A. I don't know. I did not overlay the AECOM's
- 7 final reports, if they even showed boring locations in
- 8 the final report on top of this --
- 9 Q. Okay.
- 10 A. -- figure.
- 11 Q. Do they align with Dorgan's Figure 1 in his
- 12 expert report?
- 13 A. I believe, in -- in my original creation --
- ${\tt 14}$ although I did not measure and offset it, I believe it
- 15 lined up similar to his locations.
- 16 Q. Okay. But you didn't go back and check
- 17 because now you've moved these 10 feet south, so --
- 18 A. But their depiction is still -- how it lays
- 19 in to the right of way line is the same.
- 20 Q. Okay. But that's not my question. My
- 21 question is did you go back and look at Mr. Dorgan's
- 22 report and see if these documents -- I mean, these
- 23 borings aligned with those on his report?
- 24 A. I did not go back and compare, in producing

- 1 the supplemental report, where he depicted his boring
- 2 locations.
- 3 Q. And you didn't go back -- I think you said
- 4 this, but I'm just trying to be sure.
- 5 You didn't go back and compare them to any
- 6 of the AECOM documents, correct?
 - A. Not in creating the supplemental report, no.
- Q. Did you go back to any of the exhibits used
- 9 at the hearing to see if these boring locations are in
- 10 the same location as those used in the hearing?
- 11 A. Not in the creation of the supplemental
- 12 report.
- Q. Did you in the -- initially?
- 14 A. I don't recall whether or not I looked at
- 15 the hearing exhibits because a lot of those exhibits,
- 16 I believe, were still the reports that I used in my
- 17 original report.
 - Q. Okay. But I think you said that you did
- 19 your borings off of an ELM figure, okay?
- 20 A. Right, their report.
- 21 Q. Right. So I'm talking about AECOM
- 22 documents.
- 23 A. No
 - Q. At any point in time, did you go back and

Page 52

- 1 compare these locations to where AECOM has them
- 2 plotted in its maps that were submitted to you as EPA?
- 3 A. No, I did not specifically go to their
- 4 figures and overlay to see how it repre- -- how close
- 5 they were to their locations.
- 6 Q. Okay. Did you change the locations of 1S
- 7 through 9S at all in making this map --
- 8 A. No.
- 9 Q. -- Gobelman Figure 1?
 - A. No
- Q. And why not?
- 12 A. Because they're not -- they weren't tied to
- 13 the boundary location, the northern boundary of the
- 14 right of ways, so pulling down the right of -- pulling
- 15 down the right of way line 10 feet from where it was
- 16 didn't affect how I had located those borings.
- 7 Q. If you'll turn to Gobelman Figure 2,
- 18 please -- and I'm focusing here on the northeast
- 19 excavation -- what sources did you use to place the
- 20 northeast excavation?
- 21 A. The same sources I referred to in my
- 22 original report.
- Q. You don't recall now?
- 24 A. No

- Q. Were they off of the boring locations?
- A. I believe it was probably the final report,
- 3 but that was how it was -- how it was ever referenced
- 4 in my original report. Nothing changed.
- 5 Q. Okay. So if you were to go back and do it
- $\ensuremath{\text{6}}$ now, what would be the right source to use to locate
- 7 the northeast excavation, the final report?
- 8 A. It would be -- I would assume that it would
- 9 be the final report and the -- the work plan that
- 10 depicts, actually, how it was laid in -- how it's
- 11 supposed to be measured in.
- 12 Q. The work plan, you mean the AECOM Revision 2
- 13 work plan?
- 14 A. That's one of them, yes.
- 15 Q. But you're not talking about anyone else's
- 16 work plan, you're talking about AECOM work plan and
- 17 AECOM final report, correct?
- 18 A. Correct.
- 19 Q. Where have you placed the center line of
- 20 Greenwood on this map?
- 21 MR. McGINLEY: Objection, lacks foundation.
- 22 THE WITNESS: Well, I wouldn't say that this is
- 23 the center line, it is -- it is depicting the
- 24 stationing associated with Greenwood from the 71.

Page 54

- 1 BY MS. BRICE:
- Q. And when you say "this," what are you
- 3 talking about?
- 4 A. The line that's -- that you're referring to.
- ${\tt Q.}~{\tt I}~{\tt know.}~{\tt But,}~{\tt for~the~record,}~{\tt if~you~can}$
- 6 please tell them -- describe the line.
- 7 A. It's a line that appears to be along the
- 8 southern pavement of Greenwood Avenue with stationing
- 9 marked every hundred -- hundred feet.
- Q. So you're saying you're not depicting the
- 11 center line of Greenwood with this -- with that line;
- 12 that what you just said?
- 13 A. Correct. It's obvious that that's not the
- 14 center line of Greenwood Avenue.
- Q. Okay. If you can turn to Figure 3, please?
- 16 MR. McGINLEY: Can I just ask -- before we go
- 17 further, do you think it might make sense to like just
- 18 mark this off? I mean, we're going to be reading
- 19 about this in a deposition transcript later. I mean,
- 20 maybe it would make sense --
- MS. BRICE: Sure. Sure.
- MR. McGINLEY: -- to just mark it off --
- 23 MS. BRICE: Sure.
- 24

- 1 BY MS. BRICE:
 - Q. If you want to just -- with the pink
- 3 highlighter, if you would please mark off the line
- 4 that we were just discussing.
- 5 A. (Indicating.)
- 6 Q. Thank you.
- MS. BRICE: Does that work?
- 8 MR. McGINLEY: Uh-huh.
 - MS. BRICE: Good idea.
- 10 BY MS. BRICE:

9

- 11 Q. Okay. We're turning to Gobelman Figure 3.
- 12 So my focus here is on the Waukegan waterline.
- 13 What document did you base the location of
- 14 the Waukegan waterline on?
 - A. I didn't base it upon anything in the
- 16 supplemental. It was based upon what was in the
- 17 original report.
- Q. So whatever you said in the original report
- 19 is what you based the location of the Waukegan
- 20 waterline on in this supplemental report?
- 21 A. This -- the location of the waterline didn't
- 22 change between reports.
- Q. Let's look on Figure 4, please. And you've
- 24 got the hashmarks for the AT&T lines; do you see

Page 56

Page 55

- 1 those? And then there's just --
 - A. Yes.
- 3 Q. There's a bunch of AT&T lines that are
- 4 marked with Ts, correct?
 - A. Yes.
- Q. Okay. And what was your source for the
- 7 location of the AT&T lines, the same one you used in
- 8 the initial report?
 - A. Yes.
- 10 Q. Okay. Same question for the North Shore Gas
- 11 line, please. I'm trying to find out the source of
- 12 the location of the North Shore Gas line depicted on
- 13 this supplemental report and whether it's the same
- 14 source you used in your original report?
- 15 A. It's the same source.
 - Q. Can you go to Gobelman Figure 8, please.
- 17 Can you tell me what you're trying to depict
- 18 in this document?
- 19 A. It's the allocation basis for the capping
- 20 and filling depicting the area that I attribute to
- 21 IDOT's responsibility and the area -- and it's
- 22 providing the area, the entire area, of Site 3.
- Q. Okay. What about Site 6? What are you
- 24 showing there in that hashed area?

- 1 A. It's showing the area that I assessed that's 2 attributed to IDOT's responsibility based on the board 2 order
- 4 Q. Okay. And with this pink highlighter, can
- ${\bf 5}\,$ you please outline Site 6 for me on this document?
- 6 A. (Indicating.)
- 7 Q. Thanks. And I think we said earlier that
- 8 you're -- and I just want to -- I'm not trying to
- 9 trick you, I just want to make sure I have this right.
- 10 The cost allocation method you used in your
- 11 initial report is the same method you're using in this
- 12 report?
- 13 A. Correct.
- Q. And that's true with respect to each of the
- 15 areas? Understanding that the percentages change, the
- 16 method is what I'm focused on.
- MR. McGINLEY: Objection, vague and ambiguous.
- 18 THE WITNESS: Yes. How I calculated IDOT's --
- 19 what -- the cost that attributed to IDOT was
- 20 calculated the same in the original report as in the
- 21 supplemental.
- 22 BY MS. BRICE:
- Q. With respect to each area?
- 24 A. With respect to each utility area or area

Page 58

- 1 that's being -- or what is considered -- what is
- 2 called the "Dorgan bucket list."
- 3 Q. Why is your allocation higher in the
- 4 supplemental report than in the initial report?
- 5 A. Because of the change, the more area IDOT
- 6 responsibility falls into play than -- than -- than
- 7 what was originally attributed.
- Q. In preparing your supplemental report, what
- 9 documents did you review?
- 10 A. I reviewed the original plat of highways for
- 11 the location of the right of way 0939 -- 0393.
- 12 Q. Did you review anything else?
- 13 A. I may have looked at the original as-builts,
- 14 you know, which also depicted the location of the
- 15 right of way. Other than something -- other than that
- 16 was related to 0393, I don't recall looking at any
- 17 other report other than Dorgan's -- I mean, I looked
- 18 at Dorgan's rebuttal report that initiated it.
- 19 Q. Did you go visit the site?
- 20 A. No.
- Q. What assumptions are you making in this
- 22 supplemental report, if any?
- 23 A. I don't believe I'm making any assumptions.
- Q. Okay. In your initial report you said that

- 1 the base -- your base map was right and that the
- 2 Dorgan Figure 1, the AECOM map, and the final report
- 3 and the Atwell survey were incorrect, is that right?
- A. I don't believe I used the word that they
- 5 were incorrect, I just -- I referred to they were
- 6 not -- they did not line up together.
- Q. Okay. Do you still think that Dorgan Figure
- 8 1 contained in his report is inaccurate?
 - A. I don't believe I ever said that --
- 10 Q. Okay.

q

- 11 A. -- the original report was --
- 12 Q. Do you think --
- 13 A. -- inaccurate.
- Q. Okay. Do you think Dorgan Figure 1
- 15 contained in his report is accurate?
- 16 A. I didn't review it in that manner.
- 17 Q. So you're not planning to offer an opinion
- 18 on that?
- 19 A. I don't believe so, they just -- that the
- 20 figures didn't line up in grid Exhibits 1 in my
- 21 report. The line -- they didn't line up, and that's
- 22 what's threw me to make -- make me create my own base
- 23 map for my own comfort and so --
- 24 Q. Understood.

Page 60

Page 59

- 1 A. -- for accuracy.
 - Q. I'm talking about right now. Like are
- 3 you -- do you have an opinion as to whether or not
- 4 Figure 1 or any -- let's just say all of the figures
- 5 in his report are correct?
- 6 A. I did not make an opinion whether they are
- 7 correct or incorrect.
- Q. And does that include the figures in his
- 9 rebuttal report, you have no opinion as to whether
- 10 they're correct or incorrect?
- 11 A. Yeah, I did not review it to see how --
- 12 whether it was correct or incorrect.
- Q. Do you think the AECOM final -- the map --
- 14 the AECOM final report map is correct?
- 15 A. I have --
 - MR. McGINLEY: Objection. Which one?
- MS. BRICE: The map that he referenced in his
- 18 initial report that's attached to his original report
- 19 that I think says "C-Q-M" on it.
- 20 BY MS. BRICE:
- Q. Is it your contention that that is accurate
- 22 or inaccurate at this point?
- 23 A. I have no opinion whether it's accurate or
- 24 inaccurate.

Page 61 Page 63 1 Q. Okay. 1 have an opinion. It's -- it doesn't line up with the other In your first deposition you stated you 3 ones, so something doesn't line up. I don't know 3 didn't dispute Mr. Dorgan's opinions about the costs 4 which one is correct and which one is not correct. 4 incurred, the reasonableness of the costs incurred, or So you still don't think it lines up? 5 his method of placing them into the Dorgan task As -- as it relates to what is in Exhibit 1 6 buckets. I assume you still agree with these points? 7 of the original report, they do not -- all the lines Α. Correct. 8 do not --Okay. I'm going to hand you -- okay. I'm talking about right --These -- so these are all 003848 through 3856. 9 -- make one line. MS. BRICE: Can you please mark that as an 10 11 I'm talking about right now. 11 exhibit? Well, that is the same lines that we used in 12 (Whereupon Gobelman Deposition 13 Exhibit 2 that shows that all the lines don't match --Exhibit No. 5 was marked for 13 14 don't line up perfectly. identification.) 14 15 BY MS. BRICE: 15 So -- so something didn't seem correct. I'm Q. Do you recognize these documents? 16 16 17 not sure which ones don't -- aren't correct, I just They appear to be the figures that I used in 18 know I had to create something that I could be 18 my original rebuttal report. Do you know then why they were produced? 19 accurate as I can be in depicting IDOT's allocations. Okay. Other than those boundary lines that You asked for files within a certain period 21 you depict in Exhibit 2, do you have any opinion on 21 of time, and -- and I went back and tried to dig --22 whether or not AECOM's final -- the map contained in 22 find -- make sure I had everything. 23 AECOM's final report that is attached to your initial Ο. Okay. You can set those aside for the 24 report accurately depicts the features on the site? 24 moment. Page 62 Page 64 I didn't review it for whether or not it was (Whereupon Gobelman Deposition 1 2 accurate or not --Exhibit No. 6 was marked for 2 identification.) Ο. So you're not --3 -- its features. All I looked at is the --4 BY MS. BRICE: 5 how they depicted the boundary. I'm handing you what's been marked 6 Deposition Exhibit 6, which is a Respondent's Okay. So you're not planning on offering an 7 opinion as to that? 7 Responses to Complainant's Notice of Deposition to I have no opinion at this moment. 8 Steven Gobelman on the third page; do you see that? Well, this is your one chance to give me an 9 Α. Yes. 10 opinion, so you either have an opinion or you don't. 10 Q. Have you ever seen this before? I don't have an opinion. I don't believe I saw the actual paper of 11 Do you have an opinion on whether the Atwell 12 the responses. 13 survey is correct or incorrect? So you have not seen this document before? 13 Ο. Not this report. I didn't pull it off of I do not know whether it is correct or 14 15 incorrect. I know it doesn't line up with the other 15 the -- I didn't pull it off the board's website or 16 figures. 16 anything like that, right. Do you have an opinion on it? What did you do to prepare for your 17 17 I have no opinion of why it may be accurate 18 deposition today? 18 19 or inaccurate. I looked through my supplemental report, Are you planning to offer an opinion about 20 came up yesterday and talked to the AG's -- at the 20 Ο. 21 the Atwell survey? 21 AG's office and talked about what to ex- -- what's

23

24

A.

22 going to happen, the process. That's about it.

How long did you meet with AG?

I was probably at their office from about

22

23

24

Not currently planning on it, no.

I'm not planning on it. I'm not -- I don't

Okay. Are you or are you not?

Page 65 Page 67 1 11:00 till about 4:30, I think. 1 it to see. Did you discuss the motion for sanctions He responded at 2:26 that said, "All done, 3 with the AG at any point in time? 3 same location." What did you understand him to be Yes -- I mean, not yesterday, but I saw that 4 saying? 5 document prior --I don't recall at this time what -- what 6 we're regarding [sic] to. I would assume that that --Ο. Right. -- yes. "done" it's in the same -- the layout's in the same Α. And what did you guys talk about? 8 location, but I don't recall. We just went through and what it meant. I And then right above that it says -- it's 10 didn't really -- I don't remember exactly what we 10 another e-mail from him to you at 2:53 p.m. on 11 August 13 that just says, "Done"? 11 said. 12 Q. Do you remember, generally, what you talked A. Uh-huh. 13 about? Ο. Is there a missing e-mail communication No, I don't even -- I couldn't tell you even 14 here? 15 what the motion of sanctions said. I mean, I don't --No, because a lot of the -- my communication 16 I didn't make any significant notation about it. 16 with him was verbal. And so when he got done with Ο. Okay. We're going to give you another set 17 whatever I told him to do, he would send me an e-mail 18 of exhibits. 18 to tell me it was done. MS. BRICE: I'm handing you what is SG004414 Okay. So is it your testimony that each and through 4416 -- wait. Maybe I'm not. 20 every time he says "done" there was a phone call from MS. CAISMAN: Sorry. Hang on. It's this one. 21 you asking him to do something? 21 MS. BRICE: Okay. Sorry. Different number. Or I just went down a couple desks to his 2.2 23 SG004071 through 4073. 23 office. I don't -- usually don't call him. Okay. And what were you asking him to 24 Page 66 Page 68 (Whereupon Gobelman Deposition 1 change or do? 1 Exhibit No. 7 was marked for Not -- this doesn't help me in recalling 2 identification.) 3 what it -- was changed. 4 BY MS. BRICE: You ask him to create an X-2 using X-1 and Do you recognize this document or this set 5 overlaying our Figure 1 base map on August 16, 2005; 6 of e-mails? 6 do you see that? I recognize that it's a set of e-mails. Α. Okay. And who -- who produced these And then he sends you a document that's, Ο. 9 e-mails? I mean, who went and looked for -- you know, 9 obviously -- and on your S-drive. It says, "Site 3 10 plans Exhibit-2.PDF." 10 when you got the request for documents, who was it who 11 went and actually looked for the e-mails? Α. Uh-huh. I looked for all the e-mails this last Q. Has that document been produced? 12 12 13 request. Α. 13 Can you turn to the back page. On the last Ο. And did you give it to IDOT to give to us 14 15 page, it's an e-mail from you to Mike Nguyen dated 15 now, in this last production? 16 August 16, 2018 -- August 13, I'm sorry. And you are I think it was produced in this last 17 asking him to create an exhibit showing the issue with 17 production, yes. 18 Site 3 layout, that the corners don't line up. Q. Well, you're the ones who went to look for 18 Do the corners line up in your new base map? 19 everything. 19 Not -- not for all the pieces. Yeah. I mean, it was an exhibit -- there 20 21 was -- that location, yes. It was all of Exhibit -- I For some of them? 21 I think it's not -- not on all the corners. 22 know Exhibit -- there was an Exhibit 2 figure. 23 But more so than they did back in August? 23 Okay. But this is a PDF? I would say, yes. I would have to look at Right. 24 24

Page 69 Page 71 Okay. So you think you produced that this 1 this is his S-drive? 2 time around. Would you mind to go back and check? It's -- it's a shared drive --MR. McGINLEY: For the record, I'm going to note 3 4 that the date August 16, 2018, was encompassed by your Α. -- that people have access to. 4 5 prior -- the deposition notice for his first And so I put -- we created a -- a subfolder 6 deposition. 6 inside my S-drive so that he can produce whatever MS. BRICE: Yeah, but you didn't produce these 7 documents he needs to produce and put them in there so 8 documents. You didn't pro- --8 I get it because all the documents that I have MR. McGINLEY: I believe we did produce them. 9 regarding this is in an external hard drive that he MS. BRICE: You didn't produce the e-mails. The 10 cannot have access to. 10 11 e-mails with Mr. Nguyen weren't produced, and we Okay. So in that S-drive -- have all the Ο. 12 specifically asked for them. And you went back and 12 documents that are in that S-drive been produced or 13 said you couldn't find them. 13 that were ever in that S-drive been produced? MR. McGINLEY: We've -- okay. We can talk I believe so. 14 15 about --Can you go back and check? 15 MS. BRICE: So now we have them. I can go back and check, yeah. 16 16 17 MR. McGINLEY: -- this later. 17 Ο. How many documents are in that S-drive? THE WITNESS: That figure was produced I don't know. I don't count. Α. More than five? 19 previously. Ο. 20 BY MS. BRICE: Yes, there's more than five because we 21 produced more than five in this round. 21 Q. Because that's the Exhibit 2 that was in the Ο. More than ten? 22 22 23 original report. 23 Α. I have no idea the number. August 16 -- there was no changes made to it Then there's an e-mail from Mike to you 24 Page 72 Page 70 1 after August 16? 1 saying, "Can you e-mail me the file for the right of 2 way? I need to zoom in and see the bearings and Α. When was my original report dated? August 22. 3 distances better." Okay. So August 22 -- so that -- that 5 figure would have been the figure that's in the 5 the right of way? 6 original report. He's -- I believe he's just referring to You know that for sure? You're 100 percent 7 that he needs -- he wants a PDF of the figure that --Ο. 8 positive? g that was in the -- that's attached. A. Well, it's dated August 16, so that's prior Okay. But do you have a file on the right 10 of way, either in a hard copy or electronic format? 10 to the original report.

Right. But there could have been changes

12 made to it between then and now -- then and when the

13 report was issued?

Then and -- between the 16th and when I

15 produced the report, yeah, there could have been

16 changes to it.

Okay. So you obviously keep certain 17

18 documents on your S-drive, right?

Just those documents that I want other 19

20 people -- I need to have other people see.

21 Okay. Have --

I mean, it's not really I'm producing it.

23 He's producing it back to me.

Understood, but there's an S-drive -- so 24

What's the file for -- where is the file for

I have a -- a PDF of what -- what was

12 produced in the reports of that --

That's not my question. My question is do

14 you have a file on the right of way in hard copy

15 format or electronic format?

I have a PDF of the plat of highways that I Α.

17 provided him.

Q. And that's the only thing that you have

19 relating to the right of way?

Well, I have the plans, the original Α. 2.0

21 plans --

22 Q. Okay --

23 Α. -- the as-builts.

Q. -- so I want to know what's in this file 24

Page 73 Page 75 1 he's talking about. Is there a file or not? Okay. Working doc- -- what are your working Well, I -- I don't understand when you --2 documents? 3 how you're depicting what a file is. Well, it's what the document -- it's a Word Well, me either because he wrote it, so how 4 document or Word document that you're working off of 5 for the -- to create the reports, and then you create 5 did you interpret it? I interpreted he wanted the PDF that showed 6 a PDF off of it. And it's in the --7 the right of way. Ο. Okay. Do you have -- but -- okay. Let's My external hard drive. just take that apart. Okay. Is there anyone else at Atwell -- not Do you, yourself, have a file, a physical 10 Atwell, Andrews. 10 11 file folder, on the right of way? Is information on your work with respect to 11 12 this case stored anywhere else at Andrews? 12 Α. In paper? Ο. Yes. I'm just trying to understand what you're 13 No, I have what's in the reports. And I 14 trying to say. Outside of the -- my S-drive? 14 15 have --Uh-huh. Q. Okay. Α. Well, I would guess that there are invoices 16 17 I may have that in paper. 17 and stuff regarding this case that are stored Do you have an electronic file on the right 18 elsewhere. 19 of way in a folder or sub-folder, wherever it could be Okay. Anything else? Ο. 20 possibly stored? 2.0 No. I can't think of anything else. I have a PDF of the plat of highways that --Okay. Who else has worked on this matter 21 22 I don't have a file that's called "right of way," 22 other than Mike Nguyen?

23 is [sic] that's what you're asking.

Okay. What are your files called that 24

Page 74

23

8

- 1 are -- you said that you have, you know, this -- you 2 have a hard drive that he doesn't have access to?
- Right. Α.
- And then you also have this S-drive like --
- 5 and you have -- you created a folder. What's in the
- 6 folder?
- It's just the figures that he's -- that --
- 8 the CAD stuff that he's produced for the different
- 9 reports.
- 10 That's the only thing in the folders?
- 11
- Do you have any other folders? 12
- I have my external hard drive that I've
- 14 accumulated all the figures and downloads from
- 15 everything that's been produced.
- Okay. And what's on that external hard
- 17 drive except for things that have been produced?
- And then it's my working documents that --18
- 19 that created the supplementals, the rebuttals,
- 20 reports.
- 21 Okay. Have you produced those? Ο.
- 22 Yes.
- 23 Drafts?
- I don't have drafts. 24

Page 76

Well, depending on what context of time 2 you're talking about.

Just our admin people.

Who are they?

- I'm talking about since you started working Q.
- 4 on this project to now?

Α.

Ο.

- There was a person -- an admin person, I
- 6 think, Elizabeth, Launa, Stephennie, Scherry.
- Jerri [sic] who?
 - Miller. She did uploads for the big Α.
- documents. Then there was our original CAD person...
- Price, right, something --
 - Brian Curtis.
- Curtis. Okay. So did you -- when you were 12
- 13 responding to this request for documents, this most
- 14 recent request for documents, did you go to those
- 15 people and ask them for their e-mails?
- I had all e-mails that -- that were sent
- 17 back and forth between them -- between me and them.
- Q. How do you know they -- but what about
- 19 between them and Mr. Nguyen?
- They wouldn't have communicated with him. Α. 20
- Ο. How do you know that? 21
 - Because there would be no need to
- 23 communicate with him.
- And they're not communicating between

Page 77 Page 79 1 themselves either? 1 drafts and finals. Α. No. Okay. Back to SG004071, first page. You'll Did you check? Did you ask? 3 notice on October 31st, at the bottom of this page, 3 We provided, I think, from the last time, 4 he's sending you Site 3 plans Revision 1 on the 5 documents that are all -- all their e-mails and stuff 5 S-drive, okay. And then further up he's sending you 6 that was going on. 6 Site 3 plans Revision 2. Have you produced those? But this time did --Ο. Α. So most --What was the difference between Revision 1-- did you go back -and Revision 2, if you recall? 9 I don't recall specifically. I -- I suspect -- most of those people don't exist. 10 10 Okay. The people that are -- did you go 11 that was what was in the original report and then 11 12 Revision 2 is the -- what was changed. 12 back and ask -- for the people who are still there, 13 did you go back and ask them if they have any e-mails Okav. 14 not with you relating to this project? (Whereupon Gobelman Deposition 14 No, I don't believe I specifically asked Exhibit No. 8 was marked for 15 identification.) 16 that they -- if there'd be some sort of obscure e-mail 16 17 between each other. 17 BY MS. BRICE: I believe, at the beginning of the Ο. I'm handing you Deposition Exhibit 8, which Q. 19 deposition, you said that -- you decided that the 0393 19 is SG003839 through 47. Do you see this? 20 was wrong, and you went in and placed 0393 and then 2.0 Yes. 21 you went in and moved down the various borings. Were Okay. Do you recognize this? 21 22 those separate decisions, or was that all done at Α. Yes. 2.2 23 once? Ο. Okay. My first question is there's a lot 24 that's blacked out on here. Why is that? MR. McGINLEY: Objection, misstates the witness's 24 Page 78 Page 80 1 prior testimony, vague and ambiguous. It's information that has nothing to do with Α. THE WITNESS: It's all at once because they were 2 this -- this case. 3 all tied together. Once you slide the northern Did someone direct you to black that out? 3 Q. 4 boundary down, everything goes with it. Α. 5 BY MS. BRICE: That was just your decision on your own? Q. Okay. So you created -- Mr. Nguyen created Correct. Α. 6 7 the document all at once that moved everything Has the AG's office seen non-redacted copies Ο. 8 together? 8 of this? He just -- right, in essence, yeah. 9 9 Α. No. Okay. Those -- that document has a date on Q. Okay. Let's go through these. We're 11 it. Those -- even -- even, I think, in your final 11 starting here, at least on these, at -- on 12 report that says August -- they all say like 12 October 30th. 13 August 2018. They, obviously, weren't -- you know, It looks like on October 30th there were two 14 these revisions weren't made in August 2018 --14 phone calls, is that correct? 15 Α. 15 Yes. -- do you know why the -- it wasn't updated? Q. Q. Okay. The first one talks about a hearing I forgot to correct that when I saw the 17 date, and the second one starts -- talks about the 17 18 drafts of the -- when I saw -- saw what he produced. 18 supplemental report, is that correct? The drafts? 19 19 Α. In my note, yes. Drafts or whatever for, you know... Can you explain to me what happened here and 20 20 Q. 21 Do you have copies of the drafts? 21 why there were two phone calls? Those are the documents. 22 Well, the first phone call was just giving 23 When you're saying "those," you're saying --23 me a status. And at that point I -- I informed him --The -- for the figures in my report are the 24 informed Evan that -- that there was an error with my 24

Page 81 Page 83 1 original report. Okay. It says, "E-Mail 9/11"? And then the second phone call was him Α. I believe that was the -- you wanted 3 telling me to redo and create a supplemental report. e-mails, and the date you had was, I think, 9/11. 3 Okay. If you can turn a couple pages to Okay. And "report doc"? 4 Q. 5 3843, this is -- looks like it's 12/11, "Evan, Α. Report documents. 5 6 Manville." And then what does it say? "Log book"? Ο. "Affidavit." It's my spelling of affidavit. Α. Yeah, "invoices and supporting docs." Was this a phone call or a meeting? And then what does that say? 8 Phone call. "Mike Nguyen's figure changes." 9 Okay. And then on the next page, on 1/4Ο. All right. 10 10 11 Evan, AG, Tuesday, 3:00"; did I get that right? MS. BRICE: Can you please mark this for the 11 12 record. I take it this was a meeting? (Whereupon Gobelman Deposition 13 13 I think it was just setting up another phone Exhibit No. 9 was marked for 14 14 15 call. identification.) 15 Okay. And this was setting up a phone call, 16 BY MS. BRICE: 16 17 or there was actually a phone call on that day? 17 I've just handed you Deposition Exhibit 9, 18 SG004250 through 4254. And it's a document from There was an actual phone call on that day 19 you -- an e-mail from you to Evan and Ellen and Matt 19 telling me that they wanted to set up a sort of 20 conference call with everybody on board on Tuesday at 20 on October 15, 2018, saying, "I guess I forgot to copy 21 3:00. 21 the pages from the previous logbook, four pages Okay. And is Tuesday then the 8th because I 22 attached." Do you see this? 2.2 23 have no idea what days we're talking about. 23 Α. Yep. It is -- yes, I think so. Do you know if the AG's office ever produced Ο. Page 82 Page 84 Okay. So is this the date that you had the 1 this other than in this, you know, last round within 2 conference call that you just referred to? 2 the last few days? I have -- I have no idea. Α. Yes. Q. And what happened on that conference call? Okay. If you can turn to the first page --Stated in there that -- that he was going to 5 the second page that says, "1/4," so January 4 -- I 6 afford me the board opinion about -- I suspect it was 6 think this is going back to the -- is this going back 7 your -- I forget what you call it, you sanc- -- I 7 to the year before? 8 think sanction document and then the board's opinion Α. I don't know. $9\,$ regarding it and that I was going to be deposed again Okay. Well, does it help if you look at 10 and that -- then the hearing -- talked about -- I 10 previous log -- it talks about previous logbook? 11 believe we talked about the hearing would then have to Yeah, it would -- it would be probably 2018. 12 be shifted even further back. Oh, okay. Actually, Lauren pointed out if 12 Are you sure that on 1/4 you didn't have a 13 you turn the page, it says 2017. 13 Or '17. Okay. 14 meeting or a phone call? Α. 15 I had a phone call on 1/4. 15 Q. Okay. So 1/4, can you read to me what that Other than just, you know, we're going to 16 says? It says, "Manville." And it says, "Look at 17 set up a meeting? 18 cost to remediate." I think that's what it says. I'm not sure what else was stated in that 19 phone call. There might have been a discussion of And did you do any calculations on what the 20 stuff, but I don't know. I didn't make note of it. 20 costs would be to remediate Sites 3 and 6? I don't recall back in '17 doing anything Okay. Then the next page has "1/24" on it. Α. 22 Can you tell me what happened on 1/24? 22 like that. They had a phone call wanting to produce the 23 But you could have? 23

24

Α.

It's possible. I don't know what I did back

24 documents for discovery stuff.

1 0.	Page 85		Page 87
1	then.	1	Page 87 (Whereupon Gobelman Deposition
2	Q. Okay. Next page, 1/5/2017, what does this	2	
3	say? I see "Evan, Ellen, Matt and AG." And then it	3	identification.)
4	says	4	BY MS. BRICE:
5	A. "Discovery, new, written, fact deposition,	5	Q. I'm handing you what's been marked
6	exhibits, status report, add 50 to 45."	6	Deposition Exhibit 10, SG003828 through 3837 no,
7	Q. Okay. What does that mean, "add 50 to 45"?	7	actually 3838. Have you seen this before?
8	A. I have no idea.	8	A. Only that I believe I produced it to the
9	Q. Do you have a guess?	9	AG's office.
10	A. No.	10	Q. Okay. Who did you get it from?
11	Q. Next page, please. It's this is on 1/11,	11	A. I believe I got it through our accounting
12	and it says, "AG sent files."	12	software.
13	A. "Sent files, currently"	13	Q. If you turn to the second page, 003829, it
14	Q. "Current working version," is that what that	14	says, "Leap" near the top there's "Labor and
15	says?	15	Overhead"; do you see that?
16	A. Yeah, could be. I don't know. "Version,	16	A. Yes.
17	Exhibit 67, cost projected, 71; Page 6 of 71; work to	17	Q. And then "Scherry Miller, LeapFile documents
18	be done." I don't know. It looks like "gas" it	18	for SLG," is that just sending the documents for you?
19	might have been "gas main."	19	Is that what she was doing?
20	Q. Okay. The current working version, is that	20	A. She was some of the files that were
21	a reference to something you were working on?	21	requested were too large, so she was sending them to
22	A. I don't know.	22	the AG's office through a Leap file system.
23	Q. Okay. If it was, and it says, "Sent files,"	23	Q. Okay. And then if you go down a bit, when
24	you know, what's your best understanding of what	24	we're talking about Steven Gobelman's time, we have a
	Page 86		Page 88
1	you're trying to say here?	-	a 9/13/2018 document disclosure; what is that
2	you're trying to say here? A. I don't know I don't know if "sent files"	-	a 9/13/2018 document disclosure; what is that referencing?
2	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me.	2	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what
2 3 4	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see	2 3 4	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there.
2 3 4 5	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look"	2 3 4 5	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says,
2 3 4 5	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something.	2 3 4 5	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"?
2 3 4 5 6 7	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres"	2 3 4 5 6	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall.
2 3 4 5 6 7 8	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres."	2 3 4 5 6 7 8	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours;
2 3 4 5 6 7 8	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres." Q. Okay. What does that have anything do with?	2 3 4 5 6 7 8	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours; does that help?
2 3 4 5 6 7 8 9	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres." Q. Okay. What does that have anything do with? A. I don't know.	2 3 4 5 6 7 8 9	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours; does that help? A. I may have been reviewing documents. I'm
2 3 4 5 6 7 8 9 10	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres." Q. Okay. What does that have anything do with? A. I don't know. Q. Is there anything in your report that	2 3 4 5 6 7 8 9 10	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours; does that help? A. I may have been reviewing documents. I'm not sure.
2 3 4 5 6 7 8 9 10 11	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres." Q. Okay. What does that have anything do with? A. I don't know. Q. Is there anything in your report that relates to .14 [sic] acres and 3.41 acres?	2 3 4 5 6 7 8 9 10 11	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours; does that help? A. I may have been reviewing documents. I'm not sure. Q. Okay. And then you've got "9/17,
2 3 4 5 6 7 8 9 10 11 12 13	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres." Q. Okay. What does that have anything do with? A. I don't know. Q. Is there anything in your report that relates to .14 [sic] acres and 3.41 acres? A. I refer to use acreage in my allocation on	2 3 4 5 6 7 8 9 10 11 12	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours; does that help? A. I may have been reviewing documents. I'm not sure. Q. Okay. And then you've got "9/17, information for disclosure"; do you know what that's
2 3 4 5 6 7 8 9 10 11 12 13 14	you're trying to say here? A. I don't know I don't know if "sent files" has me sending him or him sending me. Q. Okay. Next page, please. It's I can see some of it, but then over to the right it says, "Look" something "water" something. A. "Look at water." Maybe "Take off .41 acres" over "3.41 acres." Q. Okay. What does that have anything do with? A. I don't know. Q. Is there anything in your report that relates to .14 [sic] acres and 3.41 acres? A. I refer to use acreage in my allocation on the the cap process, but I don't those acres, I	2 3 4 5 6 7 8 9 10 11 12 13	a 9/13/2018 document disclosure; what is that referencing? A. Yeah, I see that. I'm not sure why what I was getting at when I put that in there. Q. Okay. How about right below that it says, "Document disclosure"? A. I don't recall. Q. Okay. Well, the one above it is 5.50 hours; does that help? A. I may have been reviewing documents. I'm not sure. Q. Okay. And then you've got "9/17, information for disclosure"; do you know what that's about?
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- ${\tt l}$ ${\tt Q.}$ Do you know who that was with?
- A. I would assume it's with the AG's office.
- Q. Okay. If you look at SG003833 on -- sort of
- 4 in the middle of the page, you've got, "Report review
- 5 and status call four hours on 10/29/2018." Who were
- 6 you talking to?
- 7 A. I assume I was talking to the AG's office,
- 8 the only people I talked to.
- Q. And did you talk to them for four hours?
- 10 A. Well, it was what I was doing. That was
- 11 just a note of what I did. It's also reviewing report
- 12 and a status call.
- Q. And then, after you had that conversation
- 14 with them, you start working on the supplemental
- 15 report on -- is that the first time you worked on the
- 16 supplemental report, 10/30/2018?
- 17 A. I believe so.
- 18 Q. Okay. Do you have any -- and then
- 19 "Supplemental report on 10/31." Okay.
- 20 Where is Mr. Nguyen's time?
- 21 A. It's on that same page we were
- 22 referencing --
- 23 Q. I see it. There it is. Okay. Got it.
- 24 Sorry. My bad.

Page 90

- Okay. And then, if you turn to SG003837,
- 2 you're working on the supplemental report, it looks
- 3 like, for a number of hours.
- 4 And then on the 13th you have a supplemental
- 5 report call. Do you know what that was about?
- 6 A. Just going -- I believe we were just going
- 7 over the --
- 8 Q. Well, you had submitted the report already.
- $\, 9 \,$ You submit it on the 7th.
- 10 A. I don't know. That's -- we were probably
- 11 talking about the submittal.
- 12 Q. Okay. And then down here, at 11/5/2018,
- 13 Mike Nguyen has, "Overlay images, check utility
- 14 location, revised Site 3 plans, areas, boring
- 15 locations, pay quantities." What are "pay
- 16 quantities"?
- 17 A. I believe he's referring to the dimensions
- 18 and stuff that we put on those figures.
- 19 Q. Okay. And this is describing the work that
- 20 he was doing, correct?
- 21 A. Yes.
- Q. Do you have a January 2019 invoice? It was
- 23 not produced.
- 24 A. I don't have one.

- O. You don't have it yet?
- 2 A. Right.
- 3 Q. But you have time from January, obviously,

Page 91

Page 92

- 4 because you had the 1/4 call and the 1/24 --
- 5 A. Yeah
- Q. -- meeting?
 - A. Yeah, right.
- Q. So if you could get -- give us a copy of
- 9 whatever you've got, that would be great.
- 10 A. Oh, okay. It just hasn't been invoiced.
- 11 Q. Understood.
- 2 MS. CAISMAN: I guess, just to comment real
- 13 quick, all these other invoices were -- were dated the
- 14 second week of the month. And so, I guess, presumably
- 15 there would be one dated the second week of January
- 16 2019 given that it's February.
- 17 THE WITNESS: It would be produced early February
- 18 for the month of January.
- 19 MS. CAISMAN: Okay. These all have --
- MR. McGINLEY: Why don't we just -- we'll just
- 21 have Mr. Gobelman check with his accounting folks.
- 22 MS. BRICE: Okay. Perfect.
- 23 MR. McGINLEY: He's not an accountant.
- 24 THE WITNESS: I mean, I can -- what I can

90

 ${\tt 1}$ produce -- those are not -- if they haven't been

2 invoiced, I can produce the -- the expense details for

- 3 the month of January.
- 4 BY MS. BRICE:
 - Q. Perfect.
- 6 A. But that's not -- I mean, I just have to
- 7 create it. It's not like it's out there.
- Q. That's fine. That would be great.
- 9 I just have a few more questions, actually.
- 10 SG004038 through 39. It's...
- 11 (Whereupon Gobelman Deposition
- 12 Exhibit No. 11 was marked for
- 13 identification.)
- 14 BY MS. BRICE:
- Q. Handing you Deposition Exhibit 11, SG004038
- 16 through 4039, and this looks like one of these
- 17 LeapFiles of documents being sent on
- 18 September 14, 2011.
- 19 Do you know what would have been -- we don't
- 20 have an invoice for September, so do you know what was
- 21 going on in September?
 - 2 A. That was prob- -- that would be more that
- 23 was produced prior to your -- your request, I believe.
- 24 September was probably given to you the last time.

Page 93 Page 95 It's definitely possible. 1 BY MS. BRICE: There's a lot of 2 documents. This is an e-mail from you to Stephennie --Yeah. And so those were the documents 3 is that how she spells her name? 4 probably relating to that process. Α. Yes. Okay. And there's -- if you turn the page, MS. BRICE: S-t-e-p-h-e-n-n-i-e. 6 there's a -- there's a list of what it looks like 6 BY MS. BRICE: 7 available files? Ο. And this is a -- this is delivered in I believe that was what was listed in that 8 September of 2018. And you're asking her to LeapFiles 9 with subfolder, quote, presentation, end quote, eight Ο. Right. And this is my question: "IDOT 10 PDF files to Evan, Ellen and Matt. 10 11 Management of Waste 9-2004 red," what is that because Α. Right. 12 I don't think I've seen that document? 12 Ο. Do you know what these are? 13 Α. I'm not sure. I believe you requested documents back Okay. I'd like a copy of it, please. 14 originally in referencing presentations that I had 14 Then there's the same thing with the next 15 done or something like that, I think. 15 16 two documents. I'm assuming you don't know what they Q. Okay. Is --16 17 are, but if you could get copies of them, that would Α. And I suspect that those were the 17 18 be helpful. 18 presentations that were sent to them. And then there's a "PD Waste Management Okay. So this isn't some different kind of 20 2001"; do you know what that is? 20 presentation you were doing for the AG --No. I don't understand what these documents 21 22 are at all. Ο. -- or something like that? 2.2 Ο. Okay. How about the "Phase II process 23 Α. No. 24 5-2003"? Okay. Ο. Page 94 Page 96 Yeah, I have no idea. I don't understand MS. BRICE: SG004041 through 4042. 1 2 why those types of documents would even be sent. (Whereupon Gobelman Deposition 2 Okay. And then the "PI CCDD," again -- all Exhibit No. 13 was marked for Q. 3 4 right -identification.) I have no clue --5 BY MS. BRICE: Α. -- I imagine --This has been marked Deposition Exhibit 13, 7 again, more e-mails relating to LeapFile. Α. -- yeah. -- "HAA" is Highway Authority --On the second page Steve [sic] Miller is 8 Ο. Authority -sending to Evan, Ellen and Matt something? 9 10 Q. -- Authority Agreement, for example, right? 10 Α. Scherry Miller. Α. Yes. Q. Scherry Miller. Do you know what she's 11 And "Acquiring liability and Avoiding It," I 12 sending? 13 think that you -- that was attached to something, but It would be the documents that you Α. 13 14 requested, that you wanted me to provide, so she was 14 to the extent that, you know, I don't have any of 15 those documents -- I think I have the "Acquiring 15 uploading that information. 16 Liability and Avoiding It," but I don't think I have Are you sure that's what it is? 17 any of the other ones. So if we could please get them I would -- I would... 17 Α. 18 produced, that would be great. 18 Okay. All right. Okay. The only reason why she would be sending. 19 Α. 19 Α. MS. BRICE: SG004224, please. Okay. So there's no other rea- -- she 20 21 wouldn't -- if you had sent a draft or something like 21 (Whereupon Gobelman Deposition Exhibit No. 12 was marked for 22 that to Evan or Ellen, it would have been sent by you, 22 23 identification.) 23 it wouldn't be sent by your admin, is that correct?

24

24

Correct.

Page 97 Page 99 1 Q. Okay. 1 this? My document's not that -- wouldn't be large I believe it's just a notification that they 3 enough that it would have to be leafed. 3 have -- telling them that -- the AG's office that they MS. BRICE: Okay. SG004371 to 4372. 4 have documents in the --Well, it's from --(Whereupon Gobelman Deposition Ο. Exhibit No. 14 was marked for -- in the -- in the Leap --Α. identification.) -- it's from the -- it's from the AG, right? 8 BY MS. BRICE: Oh, never mind. He's telling me it's So what we've got is we've got you sending 9 documents that he's providing me. 10 Breanna and Stephannie -- and this is Deposition Q. Yeah. What -- what are these? 10 11 Exhibit 14 -- on November 6, "aeeil\share." What are Α. I have no idea what they were at that -- you 11 12 you sending them? 12 know, back in November. I'm sending them the -- my report for them This is the day before -- or two days before 14 to sort of finalize it, put it together in a PDF and 14 you submitted your report, correct, your 15 put the proper cover on, all that kind of stuff. 15 supplemental --Okay. And it looks like she then puts it on Α. Okay. 16 16 17 the S-drive, is that correct? 17 Ο. -- on the 7th? Well, it was there on the S-drive already. Yeah. Okay. Yeah, I don't know what they 18 19 were. 19 Q. Okay. I mean, that's what that symbol at the 2.0 Do you have copies of them? They were PDFs. 21 bottom that you read, that "aeeil\share Gobelman" Yeah, I would probably still have copies of 21 22 that's the S-drive. 22 it --Okay. So there's a PDF there that is -- you 23 Ο. Okay. 24 know, did she make any change- -- you think she made -- in my files that were provided back to Α. Page 98 Page 100 1 changes, so perhaps we have here her making changes? 1 you, I would assume. Okay. Could you print those out for us and If it's the PDF, it would be she put it 3 together and created the final document and just wants 3 give them to us if they haven't been produced? 4 me to -- and usually what happens is they want me --MR. McGINLEY: Just for the record, everything 5 want people to look at it to make sure they didn't put 5 that's referenced in this e-mail, this is when we 6 something in the wrong place. 6 said, because of how -- the primitive technology that MS. BRICE: Okay. SG004114 through 4117. 7 we have available through the State for transferring 8 files, we have to take batches of documents, such as, (Discussion held off the record.) 8 (Whereupon, Ms. Caisman left the 9 in this case, the transcript of his October 2 9 deposition proceedings.) 10 deposition and all of the exhibits and send them in 10 11 BY MS. BRICE: 11 batches. So that's why -- what they are, and that's We'll start with 4114. I'm going to show 12 why we haven't produced them because that just 13 you -- I'm going to show you -- I'm not going to mark 13 seems --14 it as an exhibit yet -- 4114 through 4117, if you MS. BRICE: Perfect. 14 MR. McGINLEY: -- like it would be silly. 15 wouldn't mind taking a look at that. 15 Okay. This is -- at least not -- with MS. BRICE: That sounds fine. That's exactly 17 respect to 4114, which I have a copy of. 17 what I'm trying to get at. Okay. So that answers the 18 question. MS. BRICE: And let's mark that one as Deposition 19 Exhibit 15. And the same thing, I'm assuming, you're 19 (Whereupon Gobelman Deposition 20 saying for all of these that you got to look 20 Exhibit No. 15 was marked for 21 through --21 identification.) 22 MR. McGINLEY: That is correct --23 BY MS. BRICE: 23 MS. BRICE: -- through --MR. McGINLEY: -- that is for -- that is true for With respect to this document here, what is 24 24

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Page 101
                                                                                                            Page 103
 1 all three --
                                                                     BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
        MS. BRICE: -- 4117?
                                                                In The Matter of:
        MR. McGINLEY: -- everything that's referenced in
                                                             3
                                                                JOHNS MANVILLE, a Delaware
                                                               Corporation,
 4 that group of --
                                                             4
        MS. BRICE: Okay.
                                                                      Complainant,
                                                             5
                                                                 vs.
                                                                                                  PCB No. 14-3
        MR. McGINLEY: -- three e-mails.
                                                             6
                                                                                                  (Citizen Suit)
                                                                ILLINOIS DEPARTMENT OF
        MS. BRICE: Okay. Thanks. All right. I'm going
                                                             7
                                                                TRANSPORTATION,
                                                             8
 8 to wait for Lauren to get back really quickly, but I
                                                                      Respondent.
                                                             9
   think I might be done.
                                                                      This is to certify that I have read the
                                                            10
                         (Brief pause.)
1.0
                                                            11 transcript of my deposition taken in the above-
                         (Whereupon, Ms. Caisman entered
11
                                                            12 entitled cause by Lucia R. Block, Certified Shorthand
12
                         the deposition proceedings.)
                                                            13 Reporter, on the 7th day of February, 2019, and that
13 BY MS. BRICE:
                                                            14 the foregoing transcript accurately states the
             Have you ever deleted any IDOT e-mails or
14
                                                            15 questions asked and the answers given by me as they
   documents related to this matter?
15
                                                            16 now appear.
        Α.
16
                                                            17
17
             No? Is that your answer? Sorry.
        Ο.
                                                            18
18
        Α.
             Yes.
                                                                                       STEVEN L. GOBELMAN
                                                            19
        Ο.
             Okay. I'm done.
                                                            20
2.0
        MR. McGINLEY: We have no questions. Thank you.
                                                            21
        THE REPORTER: Signature reserved, Counsel?
21
                                                                SUBSCRIBED AND SWORN TO
                                                            22
        MR. McGINLEY: Yes. Can we -- actually,
22
                                                                before me this
                                                                                  2019.
                                                            23
23 before -- I need to make -- before I -- I want to talk
                                                            24
24 to you, but I need to make a phone call first. Do you
                                                                       Notary Public
                                                                                                            Page 104
                                               Page 102
 1 mind if I do that? We'll just step out of the room
                                                             1 STATE OF ILLINOIS
                                                                                        SS:
 2 and take a break.
                                                               COUNTY OF ILLINOIS
                                                                      I, Lucy R. Block, a Notary Public within and for
 3
                         (Short recess.)
        MS. BRICE: Evan, I just wanted to say on the
                                                             4 the County of Cook, State of Illinois, and a certified
 5 record to continue it with respect to the documents,
                                                             5 shorthand reporter of said state, do hereby certify:
 6 you know --
                                                                      That previous to the commencement of the
        MR. McGINLEY: Sure.
                                                             7 examination of the witness, the witness was duly sworn
        MS. BRICE: -- if there's a need.
                                                             8 to testify the whole truth concerning the matters
 8
             So I just want to say, for the record, we
                                                             9 herein:
10 would like to continue the deposition, if necessary,
                                                                      That the foregoing deposition transcript was
11 with respect to the outstanding documents. We're
                                                            11 reported stenographically by me, was thereafter
12 reserving that right.
                                                            12 reduced to typewriting under my personal direction and
        MR. McGINLEY: Understood.
                                                            13 constitutes a true record of the testimony given and
13
             We're going to order this as a rush, please.
                                                            14 the proceedings had;
14
15
                        (Whereupon, the deposition was
                                                                      That the said deposition was taken before me at
                         adjourned sine die.)
                                                            16 the time and place specified;
16
                                                                      That the said deposition was adjourned as stated
17
                                                            17
                                                            18 herein;
18
                                                                      That I am not a relative or employee or attorney
19
                                                            20 or counsel, nor a relative or employee of such
20
                                                            21 attorney or counsel for any of the parties hereto, nor
21
                                                            22 interested directly or indirectly in the outcome of
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                                                            23 this action.
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	and affix my seal of office at Arlington Heights,		
	Illinois, this 13th day of February, 2019.		
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8	Notary Public, Cook County, Illinois My commission expires 01/02/20		
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Steven L. Gobelman

Johns Manville vs. Illinois Department of Transportation (105 - 105)-

EXHIBIT 2

ILLINOIS POLLUTION CONTROL BOARD October 31, 2019

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HEARING OFFICER ORDER

The parties have filed a number motions prior to the commencement of the hearing scheduled for November 19, 2019.

On September 13, 2019, the Illinois Department of Transportation (IDOT) filed a Motion *in Limine* to Strike the Opinions of Douglas G. Dorgan, Jr. (Mot. *in Limine*). Also on September 13, 2019, Johns Manville (JM) filed a Motion to Exclude Base Maps and Related Figures and Testimony at Hearing (Mot. to Excl.). On October 4, 2019, the parties filed their respective responses. Also on October 4, 2019, IDOT filed a Motion to Strike Affidavit of Douglas G. Dorgan Jr. in Support of Complainant's Motion to Exclude Base Maps and Related Figures and Testimony at Hearing (Mot. to Strike). On October 9, 2019, JM filed a Motion for Leave to File a Reply Instanter to IDOT's Response to Complainant's Brief Regarding Motion to Exclude Base Maps, Related Figures and Testimony at Hearing. On October 10, 2019, JM filed its response to IDOT's Motion to Strike Affidavit of Douglas G. Dorgan, Jr. (Resp. Mot. to Strike). On October 15, 2019, IDOT filed its Response to JM's Motion for Leave to File a Reply Instanter to IDOT's Response to JM's Motion to Exclude Base Maps, Related Figures and Testimony at Hearing.

This order summarizes the filings and then provides my ruling on each motion.

ABBRIVIATED PROCEDURAL HISTORY

After a five-day hearing in 2016, the Board issued an interim opinion and order finding that IDOT caused and allowed open dumping of asbestos-containing material (ACM). Specifically, the Board found that IDOT caused open dumping of ACM waste along the south side of Greenwood Avenue within Site 6 and adjacent areas along the north edge of Site 3. The Board further found that IDOT allowed open dumping of ACM waste on the portion of Site 3 within Parcel 0393. Johns Manville v. Illinois Dept. of Transportation, PCB 14-3, slip op at 22-23 (Dec. 15, 2016). The Board directed the hearing officer to hold an additional hearing to develop facts necessary to derive the appropriate remedy. The Board narrowed the remedy hearing to the following three issues:

- 1. The cleanup work performed by JM in the portions of Site 3 and Site 6 where the Board found IDOT responsible for ACM waste present in soil.
- 2. The amount and reasonableness of JM's costs for this work.
- 3. The share of JM's costs attributable to IDOT. *Id.*

On August 13, 2019, the parties filed stipulations to issues one and two above but continue to dispute the share of JM's costs attributable to IDOT. It also appears that the parties do not agree on "where the Board found IDOT responsible for ACM waste in the soil". Mot. to Excl. at 3.

IDOT's MOTIONS

IDOT's Motion In Limine To Bar Opinion Testimony of Douglas G. Dorgan, Jr.

Summary of IDOT's Motion

IDOT requests an order barring JM's expert witness, Douglas G. Dorgan, from providing certain opinion testimony at hearing regarding cost attribution as set forth in his Expert Report. IDOT argues three reasons to bar Mr. Dorgan's testimony.

The first is the lack of Mr. Dorgan's relevant experience and expertise. Mot. *in Limine* at 4-7. IDOT states that Mr. Dorgan admitted in his deposition that he cannot recall ever having performed a cost attribution like the one that is at issue here. *Id.* at 5-6. Citing <u>Frye</u>¹, IDOT argues that Mr. Dorgan does not "make any reference to his having employed any sort of established method for conducting his work" as case law requires. *Id.* at 7.

Second, Mr. Dorgan cherry-picked facts that supported his cost analysis "while disregarding possibly less helpful facts" and therefore his cost analysis is "flawed and unreliable." *Id.* at 7-8.

Third, Mr. Dorgan is relitigating issues that the Board in its interim order rejected. Mot. *in Limine* at 4-9. IDOT argues that Mr. Dorgan's opinions on costs attributable to IDOT go far beyond its liability as the Board established in its interim order. *Id.* at 9-12. For instance, Mr. Dorgan opines that IDOT is responsible for all costs associated with the relocation of a City of Waukegan's water line and removal of the North Shore Gas line because all or a portion of the water and gas lines run through a portion of Site 3 within Parcel 0393. *Id.* IDOT also alleges that Mr. Dorgan attempts to enlarge IDOT's liability for Site 6. *Id.* at 10

Summary of JM's Response

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¹ <u>Frye v. United States</u>, 293 F. 1013, 1014 (D.C. Cir. 1923) (expert must demonstrate methodology accepted within the community of experts)

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JM responds that Mr. Dorgan is qualified to provide the expert opinions found in his report. Resp. at 2. JM refutes IDOT's contention that "an expert must have been tasked with the exact same assignment previously". *Id.* JM points to Mr. Dorgan's deposition where Mr. Dorgan testified that he has been tasked with similar assignments but cannot recall if he has ever been tasked with this exact scenario. *Id.* at 3. Mr. Dorgan has, however, had assignments where multiple parties were involved and had to allocate the clean-up costs between the parties. *Id.* at 4.

JM maintains that the <u>Frye</u> test is inapplicable here because Mr. Dorgan's "methodology does not involve scientific studies or tests and is neither new or novel...". *Id.* at 6. JM further argues that "an expert's testimony and opinion is admissible so long as it will assist the Board to determine the facts at issue". *Id.*

JM next contends that Mr. Dorgan's opinions do not re-litigate the Boards liability determination. JM maintains that merely because Mr. Dorgan and IDOT's expert Mr. Gobelman arrive at differing costs, mostly because of their respective approaches, does not mean that they are re-litigating issues already resolved by the Board. *Id.* at 12-13. JM argues that any discrepancy in cost allocation between the two experts are questions for the Board. *Id.*

Discussion and Ruling

In the liability phase of this enforcement proceeding, I observed and listened, as a hearing officer, to hours of testimony from JM's expert Mr. Dorgan. The Board relied on Mr. Dorgan's testimony throughout its interim opinion. Johns Manville v. IDOT, PCB 14-3 (December 15, 2016). I found him qualified then and I find him qualified now. JM concedes that Mr. Dorgan has not participated in the exact same allocation assignment, but argues that Mr. Dorgan has had similar assignments where multiple parties were involved and he had to allocate the clean-up costs between them. A person will be allowed to testify as an expert if his experience and qualifications afford him knowledge that is not common to laypersons, and where his testimony will aid the trier of fact in reaching its decision. Thompson v. Gordon, 221 Ill. 2d 414, 428-29 (Ill. 2006). Mr. Dorgan has the requisite experience and qualifications to testify to the issue of cost allocation and may assist the Board, as he has in the past, in reaching its decision.

IDOT next argues that Mr. Dorgan "cherry-picked" facts that supported his cost analysis "while disregarding possibly less helpful facts" and therefore his cost-analysis is "flawed and unreliable". Whether or not Mr. Dorgan "cherry-picked" evidence favorable to JM is not clear. However, IDOT will be able to challenge Mr. Dorgan's method of cost analysis at hearing through cross-examination if it chooses to do so.

Finally, IDOT argues that Mr. Dorgan is relitigating issues that the Board rejected in its interim order and that his opinions regarding cost attributable to IDOT go far beyond its liability the Board found in its interim order. Whether or not his opinions stray from the narrow issues articulated by the Board for the remedy hearing, that is for the Board to decide.

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IDOT's Motion *in Limine* to Strike the Opinions of Douglas G. Dorgan, Jr. is denied. That I find Mr. Dorgan's testimony admissible does not, of course, bind the Board in giving it the weight it deems appropriate. Nor does my ruling here preclude IDOT from objecting to specific issues at hearing.

IDOT's Motion to Strike Affidavit of Douglas G. Dorgan, Jr. in Support of Complainant's Motion to Exclude Base Maps and Related Figures and Testimony

Summary of IDOT's Motion

IDOT requests an order to strike the affidavit of Douglas G. Dorgan, Jr., that JM filed as Exhibit J in support of its motion to "Exclude Base Maps and Related Figures and Testimony at Hearing". ² IDOT cites to Illinois Supreme Court Rule 191 (a) in support. Rule 191 (a) requires that the affiant have personal knowledge and that the affidavit shall not consist of conclusions but of facts admissible in evidence. Mot. to Strike at 3.

IDOT first notes that Mr. Dorgan's signature on his 2019 Affidavit is "completely different" than his signature on his 2016 Affidavit. *Id.* at 4. IDOT alleges that the signatures were not written by the same person and therefore not based on Mr. Dorgan's personal knowledge as required by Rule 191 (a). As a result, Mr. Dorgan's 2019 Affidavit must be stricken in its entirety. *Id.* at 4.

Citing caselaw in support, IDOT's next argument is that paragraphs four through seven of Mr. Dorgan's 2019 Affidavit must be stricken because it is "a series of assertions that are unsupported any facts" contrary to what Rule 191 (a) requires. *Id.* at 5. IDOT cites to Cain v. Joe Contarino, Inc. 2014 II. App. (2d) 130482 (2014), where the court found that the expert ran afoul of Rule 191 (a) where he "cited mostly 'industry customs and practices' ...yet never specified their content." *Id.*

Summary of JM's Response

JM responds that IDOT has accused them of fraud and Mr. Dorgan would unequivocally testify to the validity of the signatures. Resp. Mot. to Strike at 1. JM admits that the signatures being compared may look different, however, this is because the previous document was signed over three years ago. *Id.* at 2. Finally, JM states that in the attachment marked as "Exhibit A" is an email Mr. Dorgan sent to attorneys of JM with the signed affidavit, establishing that Mr. Dorgan had personal knowledge of the matters therein. *Id.*

JM next contends that the paragraphs identified by IDOT in the 2019 Dorgan Affidavit are not conclusory and that IDOT misinterpreted the rule found in <u>Cain</u>. JM claims this is because "unlike the affidavit in <u>Cain</u>, which only referred to 'industry customs and practices' and nothing more, Mr. Dorgan's 2019 Affidavit expressly and factually identifies the industry customs and practices Mr. Gobelman failed to meet in creating the Base Maps." *Id.* at 3. JM claims that is sufficient. *Id.*

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² JM filed Mr. Dorgan's 2019 Affidavit as Exhibit A to their Mot. to Excl.

Discussion and Ruling

IDOT does not profess to being a handwriting expert, nor do I. IDOT argues that Mr. Dorgan's signature on his 2016 Affidavit is "completely different" from the signature on his 2019 Affidavit and therefore not based upon his personal knowledge as Supreme Court Rule 191 (a) requires. I note that my signature has also changed over the last three years. Unlike the summary judgment proceedings in Cain, Mr. Dorgan will be available at the hearing so that IDOT may illicit testimony from him verifying his signature on his 2019 Affidavit and the content therein if IDOT so chooses.

IDOT's argument that paragraph's four through seven must be stricken because they are conclusionary also fails. As noted above, Mr. Dorgan will be available at hearing and IDOT may cross-examine him regarding the contents of his 2019 Affidavit if it so chooses. I find that Mr. Dorgan does have personal knowledge of the contents therein and that taken as a whole, Mr. Dorgan could competently testify to the contents and to his expert reports. *See e.g.* Allied American Insurance Company v. Adam Mickiewicz, 124 Ill. App. 3d 705 (1984).

IDOT's Motion to Strike Affidavit of Douglas Dorgan's is denied. My ruling does not preclude IDOT from objecting to specific issues at hearing.

JM's Motion

JM's Motion to Exclude Base Maps and Related Figures and Testimony

Summary of JM's Motion

JM requests an order barring IDOT from introducing any evidence, testimony, or exhibits/figures relating to or premised on "Base Maps." Mot. to Excl. at 1. With the exception of the Nicor Gas Line, JM requests an order barring any related figures found in the Initial Report and Supplemental Report of Steven Gobelman and prepared by Andrews Engineering, Inc. *Id.*

JM then references the Stipulation the parties filed on August 13, 2019, and states that while the parties agree on the 'amount and reasonableness' of the costs JM incurred for removal work, "they do not agree on 'where the Board found IDOT responsible for ACM waste present in soil" and "the share of JM's cost attributable to IDOT." *Id.* at 3. JM states that what remains in dispute is:

1) the exact areas where JM did Removal Work ("Removal Areas"); 2) the areas where IDOT is responsible for ACM waste present in the soil ("IDOT Areas of Liability"); 3) the extent to which the Removal Areas are connected to the disputed IDOT Areas of Liability; and 4) the amount of the costs that should be attributed to IDOT. *Id*.

JM argues that Mr. Gobelman lacks the requisite knowledge, skill, experience, education, and expertise to have created the Base Maps. Mot.to Excl. at 9. JM states that Mr. Gobelman

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created the Base Maps because he did not agree with "how Mr. Dorgan defined the IDOT Areas of Liability" and associated attributed costs. *Id.* at 5.

JM states that during the first hearing, Mr. Dorgan, Mr. Gobelman and the Board relied on the reports and maps generated by AECOM which identified areas of liability.³ JM states that these AECOM maps were "ultimately approved" by the United States Environmental Protection Agency (USEPA). *Id.* at 7. Now for the remedial portion of the hearing, Mr. Gobelman, apparently not in agreement with cost attribution of AECOM' reports and maps, has created a Base Map⁴ to determine the areas of IDOT's liability. Mot. to Excl. at 7.

JM maintains that Mr. Gobelman lacks the relevant experience and expertise to have created the Base Maps. Mot. to Excl. at 9-11. JM's cites to Illinois Rule of Evidence 702 that provides one must rely on expertise of their own to testify as an expert, and, Mr. Gobleman admitted he lacked the expertise to create Base Maps. *Id.* JM states that Mr. Gobleman could not have relied on his own expertise because he is not an expert in AutoCAD, the program used to create Base Maps. *Id.* JM argues that Mr. Gobelman relied on the AutoCAD work of Mr. Nguyen to ensure the Base Map's accuracy, however Mr. Nguyen denies in his deposition that he played this role, stating he was "not the decision maker" and only made edits to the Base Maps at the direction of Mr. Gobleman. *Id.* at 10. JM requests an order barring the inclusion of these Base Maps and related Figures because Mr. Gobleman, who lacked the expertise in the area, controlled the entire Base Map creation process without any input from Mr. Nguyen, who has experience creating base maps. *Id.*

JM also argues that the Base Maps lack adequate foundation because their creation did not rely on and/or follow the appropriate applicable standards. Mot. to Excl. at 11-12. Furthermore, JM maintains the Base Maps were not created using facts or data relied upon by experts in the field. *Id.* JM asserts that Mr. Gobleman did not use AECOM and instead built the boundaries based on an aerial image from Google, resulting in a conflict from AECOM's Final Site Survey boundaries and that failure to follow appropriate standards led to critical mistakes in creating the Base Maps. *Id.* at 13-14.

JM also argues that key features fail to align with their location as depicted on the AECOM maps. *Id.* at 15. JM claims that established scientific principles and accepted methodologies were not followed in creating the Base Maps because the maps were built using inconsistent sources and because the maps moved fixed features, thus unreliable. *Id.* at 15-17. JM continues its assertions and maintains that the documents Mr. Nguyen used to create the Base Map, including the ELM documents⁵, should not have been used because he did not believe they were reliable. *Id.* at 20.

³ AECOM is JM's environmental consultant.

⁴ Mr. Gobelman's Base Map was created with the assistance of Michael Nguyen, a CAD manager. "CAD is a computer aided design and drafting technology which is routinely used to make maps." Mot. to Excl. at 7.

⁵ ELM documents are documents, including maps and figures, generated by ELM Consulting.

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Finally, JM argues that the reliance on Mr. Nguyen was unreasonable and unreliable. *Id.* at 19. JM references Mr. Nguyen's deposition, where he admits to not having any say or control as to what was prepared. *Id.* at 20. JM claims that if Mr. Gobelman actually relied on Mr. Nguyen to create the Base Maps, his reliance was unreasonable, especially after having been made aware of all the mistakes in the Base Maps that Mr. Dorgan had identified in the Dorgan Rebuttal Report. *Id.* at 20-21.

Summary of IDOT's Response

IDOT responds to JM's assertions and maintains that Mr. Gobelman is qualified to provide his expert opinions on cost attribution analysis and that his Base Maps are reasonable and reliable based on his vast experience in dealing with remediation projects and economic considerations. Resp. at 12-15. IDOT also argues that there was no USEPA approved maps or figures for the Site and even if there were, they have no bearing on how to assess cost attribution. *Id.* at 15-16.

IDOT argues that Mr. Gobelman's reliance on Mr. Nguyen's CAD work was reasonable. *Id.* at 19-20. IDOT states that Mr. Nguyen has 17 years working for Andrews Engineering as a CAD technician. *Id.* at 19. Therefore, Mr. Nguyen's CAD work at issue here is trustworthy and has the requisite foundation. *Id.* at 20. IDOT also maintains that reliance on the ELM documents was reasonable given that the USEPA relied on them when approving a remediation plan, as well as Mr. Dorgan and the Board in its interim order finding liability. *Id.*

Finally, IDOT argues that if Mr. Gobelman's reliance on Mr. Nguyen was not reasonable, "then Mr. Dorgan's CAD drafter similarly lacks an adequate foundation, as his CAD drafter approached her [Riah Dunton] work similarly to how Mr. Nguyen approached his work for Mr. Gobelman and thus not reasonable. *Id*.

Discussion and Ruling

Applying the same standard and reasoning used in my ruling regarding the testimony of Mr. Dorgan, I find that Mr. Gobelman has the requisite expertise to use Base Maps to determine areas of liability instead of reports and maps generated by AECOM. As IDOT notes, and I have observed, Mr. Gobelman has vast experience in dealing with remediation and economic considerations. I also find that Mr. Gobelman's reliance on Mr. Nguyen's CAD work was reasonable. Finally, Mr. Nguyen's 17 years' experience working for Andrews Engineering as a CAD drafter satisfies any foundation issues.

JM's Motion to Exclude Base Maps and Related Figures and Testimony is denied. That I find Mr. Gobelman's testimony admissible does not, of course, bind the Board in giving it the weight it deems appropriate. Nor does my ruling preclude JM from renewing its objections to specific issues at hearing.

JM's Motion For Leave to Reply To IDOT's Response to Complainant's Motion to Exclude Base Maps, Related Figures and Testimony at Hearing

On October 9, 2019, JM filed a motion for leave to reply to IDOT's response regarding JM's motion to exclude. On October 15, 2019, IDOT filed a response requesting the hearing officer deny JM's motion.

Section 101.500 (e) of the Board's procedural rules states that there is no right to reply except as the Board or the hearing officer permits to prevent material prejudice. After having reviewed JM's motion for leave to reply, I find that no material prejudice would result if the motion was denied.

JM's motion for leave to file a reply is denied.

Motions for Interlocutory Appeal from Hearing Officer Orders

The parties are advised that if they choose to file an interlocutory appeal, it must be filed within 14 days after the party receives the hearing officer's written order. Filing a motion for interlocutory appeal will not postpone a scheduled hearing, stay the effect of the hearing officer's ruling, or otherwise stay the proceeding. *See* Section 101.518 of the Board's procedural rules. *But see* Section 101.514 of the Board's procedural rules addressing motions to stay proceedings.

IT IS SO ORDERED.

Bradley P. Halloran

Hearing Officer

Illinois Pollution Control Board

James R. Thompson Center, Suite 11-500

Bradly P. Helon

100 W. Randolph Street

Chicago, Illinois 60601

312.814.8917

Brad.Halloran@illinois.gov

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CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were e-mailed on October 31, 2019, to each of the persons on the attached service list.

It is hereby certified that a true copy of the foregoing order was e-mailed to the following on October 31, 2019:

Don Brown Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Ste. 11-500 Chicago, Illinois 60601

Bradley P. Halloran

Hearing Officer

Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500

Bradly P. Helon-

Chicago, Illinois 60601

@ Consents to electronic service

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SERVICE LIST

PCB 2014-003 @ Matthew D. Dougherty Illinois Department of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764

PCB 2014-003 @ Lauren J. Caisman Bryan Cave Leighton Paisner, LLC 161 N. Clark Street Suite 4300 Chicago, IL 60601-3715

PCB 2014-003 @ Evan J. McGinley Office of the Attorney General 69 W. Washington Street, Suite 1800 Chicago, IL 60602

PCB 2014-003@ Gabrielle Sigel Jenner & Block LLP 353 N. Clark Street Chicago, IL 60654 PCB 2014-003@ Ellen O'Laughlin Office of the Attorney General 69 W. Washington Street, Suite 1800 Chicago, IL 60602

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PCB 2014-003@ Robert W. Brunner Bryan Cave Leighton Paisner, LLC 161 N. Clark Street Suite 4300 Chicago, IL 60601-3715

EXHIBIT 3



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JOHNS MANVILLE, a Delaware corporation,)	
Complainant,)	
v.)	PCB No. 14-3 (Citizen Suit)
ILLINOIS DEPARTMENT OF	Ć	,
TRANSPORTATION,)	
)	
Respondent.)	

AFFIDAVIT OF STEVEN GOBELMAN

I, STEVEN GOBELMAN, certify under penalty of perjury that the statements set forth in this affidavit are true and correct, and hereby declare and state as follows:

- 1. I was asked by the Illinois Department of Transportation ("IDOT") to provide expert opinion and testimony in this matter. On August 22, 2018, I provided the "Expert Rebuttal Report of Steven Gobelman on Damages Attributable to IDOT based on IPCB Order of December 15, 2016." In this Report, I attached as an Exhibit a base map that I created for this matter.
- 2. On October 26, 2018, I was provided the "Expert Rebuttal Report of Douglas G. Dorgan Jr. on Damages Attributable to IDOT". In that Report, Dorgan wrote that the base map I created had the location of the right of way ("ROW") to Parcel 0393 wrong.
- 3. I then re-examined the placement of the ROW to Parcel 0393 on the base map I created, and realized during the process of placing the northern boundary of Site 3 to the existing fence line, and trying to line everything up, I did not make sure the location of the line for the ROW to Parcel 0393 was set. As a result on my base map, the ROW of Parcel 0393 was incorrectly pushed approximately ten feet to the north.

- 4. On October 30, 2018, we revised the base map and correctly set the ROW to Parcel 0393. The only significant change in re-creating the base map was to correct the placement of the ROW to Parcel 0393. By correcting the placement of the ROW line, the depiction of the site layout, including the northern boundary of Site 3 and the borings in Site 3, shifted approximately ten feet south.
- 5. Given the change in location of the ROW to Parcel 0393, the calculations needed to be corrected to adjust for the corrected base map. In correcting the placement of the ROW to Parcel 0393, IDOT's proportionate cost increased as more costs fell within its area of responsibility. I immediately re-did the calculations and completed my "Expert Rebuttal Supplemental Report of Steven Gobelman on Damages Attributable to IDOT Based on IPCB Order of December 15, 2016" on November 7, 2018.

FURTHER, AFFIANT SAYETH NOT.

SZEVEN GOBELMAN

CHELSEE L. BOSTICK
OFFICIAL SEAL
NOTARY PUBLIC
STATE OF ILLINOIS
MY COMMISSION EXPIRES
MARCH 07, 2020

SUBSCRIBED AND SWORN to before me

this 12th day of December, 2018.

EXHIBIT 4