## ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD,	)	
HOMEWOOD ILLINOIS, VILLAGE OF	)	
ORLAND PARK, ORLAND PARK	)	
ILLINOIS, VILLAGE OF MIDLOTHIAN,	)	
MIDLOTHIAN ILLINOIS, VILLAGE OF	)	
TINLEY PARK, TINLEY PARK ILLINOIS,	)	PCB 16-14 (Homewood)
EXXONMOBIL OIL CORPORATION,	)	PCB 16-15 (Orland Park)
VILLAGE OF WILMETTE, WILMETTE	)	PCB 16-16 (Midlothian)
ILLINOIS, CITY OF COUNTRY CLUB	)	PCB 16-17 (Tinley Park)
HILLS, COUNTRY CLUB HILLS	)	PCB 16-18 (ExxonMobil)
ILLINOIS, NORAMCO-CHICAGO, INC.,	)	PCB 16-20 (Wilmette)
FLINT HILLS RESOURCES JOLIET LLC,	)	PCB 16-21 (Country Club Hills)
CITY OF EVANSTON, EVANSTON	)	PCB 16-22 (Noramco-Chicago)
ILLINOIS, VILLAGE OF SKOKIE,	)	PCB 16-23 (INEOS Joliet)
SKOKIE ILLINOIS, ILLINOIS	)	PCB 16-25 (Evanston)
DEPARTMENT OF TRANSPORTATION,	)	PCB 16-26 (Skokie)
METROPOLITAN WATER	)	PCB 16-27 (IDOT)
RECLAMATION DISTRICT OF	)	PCB 16-29 (MWRDGC)
GREATER CHICAGO, VILLAGE OF	)	PCB 16-30 (Richton Park)
RICHTON PARK, RICHTON PARK	)	PCB 16-31 (Lincolnwood)
ILLINOIS, VILLAGE OF	)	PCB 16-33 (Oak Forest)
LINCOLNWOOD, LINCOLNWOOD	)	PCB 19-7 (Village of Lynwood)
ILLINOIS, CITY OF OAK FOREST, OAK	)	PCB 19-8 (Citgo Holdings)
FOREST ILLINOIS, VILLAGE OF	)	PCB 19-9 (New Lenox)
LYNWOOD, LYNWOOD ILLINOIS,	)	PCB 19-10 (Lockport)
CITGO HOLDINGS, INC., VILLAGE OF	)	PCB 19-11 (Caterpillar)
NEW LENOX, NEW LENOX ILLINOIS,	)	PCB 19-12 (Crest Hill)
CITY OF LOCKPORT, LOCKPORT	)	PCB 19-13 (Joliet)
ILLINOIS, CATERPILLAR, INC., CITY	)	PCB 19-14 (Morton Salt)
OF CREST HILL, CREST HILL ILLINOIS,	)	PCB 19-15 (Palos Heights)
CITY OF JOLIET, JOLIET ILLINOIS,	)	PCB 19-16 (Romeoville)
MORTON SALT, INC., CITY OF PALOS	)	PCB 19-17 (IMTT Illinois)
HEIGHTS, PALOS HEIGHTS ILLINOIS,	)	PCB 19-18 (Stepan)
VILLAGE OF ROMEOVILLE,	)	PCB 19-19 (Park Forest)
ROMEOVILLE ILLINOIS, IMTT	)	PCB 19-20 (Ozinga Ready Mix)
ILLINOIS LLC, STEPAN CO., VILLAGE	)	PCB 19-21 (Ozinga Materials)
OF PARK FOREST, PARK FOREST	)	PCB 19-22 (Midwest Marine)
ILLINOIS, OZINGA READY MIX	)	PCB 19-23 (Mokena)
CONCRETE, INC., OZINGA	)	PCB 19-24 (Oak Lawn)
MATERIALS, INC., MIDWEST MARINE	)	PCB 19-25 (Dolton)
TERMINALS LLC, VILLAGE OF	)	PCB 19-26 (Glenwood)
MOKENA, MOKENA ILLINOIA,	)	PCB 19-27 (Morton Grove)
VILLAGE OF OAK LAWN, OAK LAWN	)	PCB 19-28 (Lansing)
ILLINOIS, VILLAGE OF DOLTON,	)	PCB 19-29 (Frankfort)

DOLTON ILLINOIS, VILLAGE OF	)	PCB 19-30 (Winnetka)
GLENWOOD, GLENWOOD ILLINOIS,	)	PCB 19-31 (La Grange)
VILLAGE OF MORTON GROVE,	)	PCB 19-33 (Channahon)
MORTON GROVE ILLINOIS, VILLAGE	)	PCB 19-34 (CCDTH)
OF LANSING, LANSING ILLINOIS,	)	PCB 19-35 (Niles)
VILLAGE OF GRANKFORT,	)	PCB 19-36 (Skyway)
FRANKFORT ILLINOIS, VILLAGE OF	)	PCB 19-37 (Elwood)
WINNETKA, WINNETKA ILLINOIS,	)	PCB 19-38 (Chicago)
VILLAGE OF LA GRANGE, LA GRANGE	)	PCB 19-40 (Crestwood)
ILLINOIS, VILLAGE OF CHANNAHON,	)	PCB 19-48 (Riverside)
CHANNAHON ILLINOIS, COOK	)	(Time-Limited Water Quality
COUNTY DEPARTMENT OF	)	Standard)
TRANSPORTATION AND HIGHWAYS,	)	(Consolidated)
VILLAGE OF NILES, NILES ILLINOIS,	)	
SKYWAY CONCESSION COMPANY	)	
LLC, VILLAGE OF ELWOOD, ELWOOD	)	
ILLINOIS, CITY OF CHICAGO,	)	
CHICAGO ILLINOIS, VILLAGE OF	)	
CRESTWOOD, CRESTWOOD ILLINOIS	)	
AND VILLAGE OF RIVERSIDE,	)	
RIVERSIDE ILLINOIS,	)	
	)	
Petitioners,	)	
	)	
V.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

#### **NOTICE OF FILING**

PLEASE TAKE NOTICE that on April 21, 2020, I have electronically filed with the Office of the Clerk of the Pollution Control Board the enclosed *Petitioner City of Joliet's Concurrence and Adoption of Metropolitan Water Reclamation District of Greater Chicago's Post-Hearing Brief* a copy of which is herewith served upon you.

Martin J. Shanahan, Jr. Corporation Counsel ARDC# 06256657 City of Joliet – Legal Department 150 W. Jefferson St. Joliet, IL 60432 Phone: (815)724-3800

mshanahan@jolietcity.org awyss@jolietcity.org Respectfully submitted, CITY OF JOLIET, a municipal corporation,

By: Mylland.

#### **PROOF OF SERVICE**

The undersigned, a non-attorney, certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that she caused a copy of the foregoing *Notice of Filing* and *Petitioner City of Joliet's Concurrence and Adoption of Metropolitan Water Reclamation District of Greater Chicago's Post-Hearing Brief*, to be served via electronic mail on the 21<sup>st</sup> day of April, 2020 to the parties listed in the service list attached.

Alexandra Wyss

Legal Assistant

#### **SERVICE LIST**

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500

100 W. Randolph Street Chicago, IL 60601

PCB 2016-014@ Sara Terranova

**IEPA** 

1021 North Grand Avenue East

P.O. Box 19276

Springfield, IL 62794-9276

PCB 2016-014@ Stefanie N. Diers

**IEPA** 

1021 North Grand Avenue East

P.O. Box 19276

Springfield, IL 62794-9276

PCB 2016-015@ Dennis Walsh

Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue

Suite 17

Orland Park, IL 60477

PCB 2016-016@ David J. Freeman

Robbins, Schwartz, Nicholas,

Lifton & Taylor, Ltd 631 E. Boughton Road

Suite 200

Bolingbrook, IL 60440

PCB 2016-017@ Dennis Walsh

Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue

Suite 17

Orland Park, IL 60477

Don Brown, Clerk of the Board Illinois Pollution Control Board

James R. Thompson Center, Suite 11-500

100 W. Randolph Street Chicago, IL 60601

PCB 2016-014@

Christopher J. Cummings Christopher J. Cummings, P.C.

2014 Hickory Road

Suite 205

Homewood, IL 60430

PCB 2016-014@ Albert Ettinger

Law Firm of Albert Ettinger

53 W. Jackson Suite 1664

Chicago, IL 60604

PCB 2016-015@ E. Kenneth Friker

Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue

Suite 17

Orland Park, IL 60477

PCB 2016-016@ Peter Murphy

11800 S. 75<sup>th</sup> Avenue

Suite 101

Palos Heights, IL 60463

PCB 2016-018@ Katherine D. Hodge

Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711

PCB 2016-020@ Dennis Walsh Tressler, LLP 233 S. Wacker Drive 22<sup>nd</sup> Floor Chicago, IL 60606

PCB 2016-021@
Peter D. Coblentz
Rosenthal, Murphey, Coblentz
& Donahue
30 N. LaSalle Street, Suite 1624

PCB 2016-023@ Katherine D. Hodge Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711

Chicago, IL 60602

PCB 2016-025@ David Stoneback, Director City of Evanston 555 Lincoln St. Evanston, IL 60201

PCB 2016-025@ Lindsey Ott City of Evanston 555 Lincoln St. Evanston, IL 60201

PCB 2016-026@ Melanie Pettway Village of Skokie 5127 Oakton Street Skokie, IL 60077

PCB 2016-027@ Matthew D. Dougherty Special Assistant Attorney General Illinois Dept. of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764 PCB 2016-021@ Amber M. Samuelson Rosenthal, Murphey, Coblentz & Donahue 30 N. LaSalle Street, Suite 1624 Chicago, IL 60602

PCB 2016-022@ John P. Antonopoulos Antonopoulos & Virtel, PC 15419 127<sup>th</sup> Street Suite 100 Lemont, IL 60439

PCB 2016-023@ Joshua Houser Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711

PCB 2016-025@ Mario Treto Corporation Counsel City of Evanston Law Department 2100 Ridge Road Evanston, IL 60201

PCB 2016-026@ James G. McCarthy Village of Skokie 5127 Oakton Street Skokie, IL 60077

PCB 2016-026@ Michael M. Lorge Village of Skokie 5127 Oakton Street Skokie, IL 60077

PCB 2016-029@ Margaret T. Conway Metropolitan Water Reclamation District 100 E. Erie Street Chicago, IL 60611

PCB 2016-029@ Fredric P. Andes Barnes & Thornburg 1 N. Wacker Drive

Suite 4400

Chicago, IL 60606

PCB 2016-030@ Peter D. Coblentz

Rosenthal, Murphey Coblentz

& Donahue

30 N. LaSalle Street, Suite 1624

Chicago, IL 60602

PCB 2016-033@ Richard Rinchich

Director of Public Works

City of Oak Forest

15440 S. Central Avenue Oak Forest, IL 60452

PCB 2016-033@ Erin K. Lavery

Klein, Thorpe & Jenkins, Ltd.

20 N. Wacker Drive

**Suite 1660** 

Chicago, IL 60606

PCB 2016-030@ Amber M. Samuelson

Rosenthal, Murphey, Coblentz

& Donahue

30 N. LaSalle Street, Suite 1624

Chicago, IL 60602

PCB 2016-031@ Andrew N. Fiske Elrod Friedman LLP 325 N. LaSalle Street

Suite 450

Chicago, IL 60654

PCB 2016-033@ Dennis G. Walsh

Klein, Thorpe & Jenkins, Ltd.

20 N. Wacker Drive

**Suite 1660** 

Chicago, IL 60606

PCB 2016-033@ Scott F. Uhler

Klein, Thorpe & Jenkins, Ltd.

20 N. Wacker Drive

Suite 1660

Chicago, IL 60606

## ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD,	)	
HOMEWOOD ILLINOIS, VILLAGE OF	)	
ORLAND PARK, ORLAND PARK	)	
ILLINOIS, VILLAGE OF MIDLOTHIAN,	)	
MIDLOTHIAN ILLINOIS, VILLAGE OF	)	
TINLEY PARK, TINLEY PARK ILLINOIS,	)	PCB 16-14 (Homewood)
EXXONMOBIL OIL CORPORATION,	)	PCB 16-15 (Orland Park)
VILLAGE OF WILMETTE, WILMETTE	)	PCB 16-16 (Midlothian)
ILLINOIS, CITY OF COUNTRY CLUB	)	PCB 16-17 (Tinley Park)
HILLS, COUNTRY CLUB HILLS	)	PCB 16-18 (ExxonMobil)
ILLINOIS, NORAMCO-CHICAGO, INC.,	)	PCB 16-20 (Wilmette)
FLINT HILLS RESOURCES JOLIET LLC,	)	PCB 16-21 (Country Club Hills)
CITY OF EVANSTON, EVANSTON	)	PCB 16-22 (Noramco-Chicago)
ILLINOIS, VILLAGE OF SKOKIE,	)	PCB 16-23 (INEOS Joliet)
SKOKIE ILLINOIS, ILLINOIS	)	PCB 16-25 (Evanston)
DEPARTMENT OF TRANSPORTATION,	)	PCB 16-26 (Skokie)
METROPOLITAN WATER	)	PCB 16-27 (IDOT)
RECLAMATION DISTRICT OF	)	PCB 16-29 (MWRDGC)
GREATER CHICAGO, VILLAGE OF	)	PCB 16-30 (Richton Park)
RICHTON PARK, RICHTON PARK	)	PCB 16-31 (Lincolnwood)
ILLINOIS, VILLAGE OF	)	PCB 16-33 (Oak Forest)
LINCOLNWOOD, LINCOLNWOOD	)	PCB 19-7 (Village of Lynwood)
ILLINOIS, CITY OF OAK FOREST, OAK	)	PCB 19-8 (Citgo Holdings)
FOREST ILLINOIS, VILLAGE OF	)	PCB 19-9 (New Lenox)
LYNWOOD, LYNWOOD ILLINOIS,	)	PCB 19-10 (Lockport)
CITGO HOLDINGS, INC., VILLAGE OF	)	PCB 19-11 (Caterpillar)
NEW LENOX, NEW LENOX ILLINOIS,	)	PCB 19-12 (Crest Hill)
CITY OF LOCKPORT, LOCKPORT	)	PCB 19-13 (Joliet)
ILLINOIS, CATERPILLAR, INC., CITY	)	PCB 19-14 (Morton Salt)
OF CREST HILL, CREST HILL ILLINOIS,	)	PCB 19-15 (Palos Heights)
CITY OF JOLIET, JOLIET ILLINOIS,	)	PCB 19-16 (Romeoville)
MORTON SALT, INC., CITY OF PALOS	)	PCB 19-17 (IMTT Illinois)
HEIGHTS, PALOS HEIGHTS ILLINOIS,	)	PCB 19-18 (Stepan)
VILLAGE OF ROMEOVILLE,	)	PCB 19-19 (Park Forest)
ROMEOVILLE ILLINOIS, IMTT	)	PCB 19-20 (Ozinga Ready Mix)
ILLINOIS LLC, STEPAN CO., VILLAGE	)	PCB 19-21 (Ozinga Materials)
OF PARK FOREST, PARK FOREST	)	PCB 19-22 (Midwest Marine)
ILLINOIS, OZINGA READY MIX	)	PCB 19-23 (Mokena)
CONCRETE, INC., OZINGA	)	PCB 19-24 (Oak Lawn)
MATERIALS, INC., MIDWEST MARINE	)	PCB 19-25 (Dolton)
TERMINALS LLC, VILLAGE OF	)	PCB 19-26 (Glenwood)
MOKENA, MOKENA ILLINOIA,	)	PCB 19-27 (Morton Grove)
VILLAGE OF OAK LAWN, OAK LAWN	)	PCB 19-28 (Lansing)
ILLINOIS, VILLAGE OF DOLTON,	)	PCB 19-29 (Frankfort)

DOLTON ILLINOIS, VILLAGE OF	,	PCB 19-30 (Winnetka)
GLENWOOD, GLENWOOD ILLINOIS,	)	PCB 19-31 (La Grange)
	)	` •
VILLAGE OF MORTON GROVE,	)	PCB 19-33 (Channahon)
MORTON GROVE ILLINOIS, VILLAGE	)	PCB 19-34 (CCDTH)
OF LANSING, LANSING ILLINOIS,	)	PCB 19-35 (Niles)
VILLAGE OF GRANKFORT,	)	PCB 19-36 (Skyway)
FRANKFORT ILLINOIS, VILLAGE OF	)	PCB 19-37 (Elwood)
WINNETKA, WINNETKA ILLINOIS,	)	PCB 19-38 (Chicago)
VILLAGE OF LA GRANGE, LA GRANGE	)	PCB 19-40 (Crestwood)
ILLINOIS, VILLAGE OF CHANNAHON,	)	PCB 19-48 (Riverside)
CHANNAHON ILLINOIS, COOK	)	(Time-Limited Water Quality
COUNTY DEPARTMENT OF	)	Standard)
TRANSPORTATION AND HIGHWAYS,	)	(Consolidated)
VILLAGE OF NILES, NILES ILLINOIS,	)	
SKYWAY CONCESSION COMPANY	)	
LLC, VILLAGE OF ELWOOD, ELWOOD	)	
ILLINOIS, CITY OF CHICAGO,	)	
CHICAGO ILLINOIS, VILLAGE OF	)	
CRESTWOOD, CRESTWOOD ILLINOIS	)	
AND VILLAGE OF RIVERSIDE,	)	
RIVERSIDE ILLINOIS,	)	
	ĺ	
Petitioners,	í	
,	Ś	
V.	ý	
••	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
TROTECTION AGENCT,	<i>)</i>	
Dagnandant	) )	
Respondent.	)	

#### PETITIONER CITY OF JOLIET'S CONCURRENCE AND ADOPTION OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO'S POST-HEARING BRIEF

NOW COMES Petitioner, CITY OF JOLIET, by and through its attorney, Martin J. Shanahan, Jr., Corporation Counsel, to respectfully submit its post-hearing brief in this matter, states as follows:

The City of Joliet has reviewed the post-hearing brief prepared by the counsel for the Metropolitan Water Reclamation District of Greater Chicago ("MWRDGC")(PCB 16-29) and the City of Joliet concurs and adopts the brief filed by them. Furthermore, the City of Joliet

incorporates the arguments and positions stated by MWRDGC except where they do not apply to the individual circumstances of the City of Joliet. In such instances, the City of Joliet endorses in general principal the positions of MWRDGC.

DATED: April 21, 2020

Respectfully submitted,

CITY OF JOLIET, a municipal corporation,

By: Mylland -

Martin J. Shanahan, Jr. Corporation Counsel ARDC# 06256657 City of Joliet – Legal Department 150 W. Jefferson St. Joliet, IL 60432

Phone: (815)724-3800 mshanahan@jolietcity.org awyss@jolietcity.org