

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

In the Matter of:	)	
	)	
STANDARD FOR THE DISPOSAL OF	)	
COAL COMBUSTION RESIDUALS	)	R2020-019
IN SURFACE IMPOUNDMENTS:	)	(Rulemaking - Land)
PROPOSED NEW 35 ILL. ADMIN.	)	
CODE 845	)	
	)	
	)	
	)	
	)	

**NOTICE OF ELECTRONIC FILING**

To: Attached Service List

PLEASE TAKE NOTICE that on July 16, 2020, I electronically filed with the Clerk of the Illinois Pollution Control Board (“Board”) the **APPEARANCE AND CONSENT TO EMAIL SERVICE OF MELISSA LEGGE and VERIFIED STATEMENT OF MELISSA LEGGE**, copies of which are served on you along with this notice.

Dated: July 16, 2020

Respectfully Submitted,



Jennifer Cassel (IL Bar No. 6296047)  
Earthjustice  
311 S. Wacker Dr., Suite 1400  
Chicago, IL 60606  
(312) 500-2198 (phone)  
jcassel@earthjustice.org

*Attorney for Prairie Rivers Network*

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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In the Matter of:	)	
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STANDARD FOR THE DISPOSAL OF	)	
COAL COMBUSTION RESIDUALS	)	R2020-019
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PROPOSED NEW 35 ILL. ADMIN.	)	
CODE 845	)	
	)	
	)	
	)	
	)	

**APPEARANCE AND CONSENT TO E-MAIL SERVICE OF  
MELISSA LEGGE**

I hereby enter my appearance on behalf of PRAIRIE RIVERS NETWORK. I authorize the service of documents on me by e-mail in lieu of receiving paper documents in the above-captioned proceeding. My e-mail address to receive service is as follows:

[mlegge@earthjustice.org](mailto:mlegge@earthjustice.org).

Dated: July 16, 2020

Respectfully Submitted,



Melissa Legge  
Earthjustice  
48 Wall Street, 15<sup>th</sup> Floor  
New York, NY 10005  
(212) 823-4978 (phone)  
(212) 918-1556 (fax)  
[mlegge@earthjustice.org](mailto:mlegge@earthjustice.org)

*Attorney for Prairie Rivers Network*

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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STANDARD FOR THE DISPOSAL OF	)	R2020-019
COAL COMBUSTION RESIDUALS	)	(Rulemaking - Land)
IN SURFACE IMPOUNDMENTS:	)	
PROPOSED NEW 35 ILL. ADMIN.	)	
CODE 845	)	
	)	
	)	
	)	
	)	

**VERIFIED STATEMENT OF MELISSA LEGGE**

I, Melissa Legge, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Melissa Anne Legge, and my date of birth is January 1, 1988. The address of offices from which I practice law and related email address and telephone numbers are as follows:

Earthjustice  
48 Wall Street, 15<sup>th</sup> Floor  
New York, NY 10005  
[mlegge@earthjustice.org](mailto:mlegge@earthjustice.org)  
(212) 823-4978 (phone)

2. I represent Prairie Rivers Network in In the Matter of Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed New 35 Ill. Adm. Code 845 (R2020-019) before the Illinois Pollution Control Board.

3(a). I have not filed any other appearance pursuant to this rule during this calendar year.

3(b). I have not received a registration number from the ARDC.

4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and

my full admission name and license number:

State Bar of New York, Second Judicial Department, Melissa Anne  
Legge, No. 5596739 (admitted 4/4/2018).

4(b). I attach a certificate of good standing for each of the jurisdictions listed in  
paragraph 4(a) above.

5. I have no office or other presence in Illinois for the practice of law.

6. I submit to the disciplinary authority of the Supreme Court of Illinois;

7. I have undertaken to become familiar with and to comply, as if admitted to  
practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois  
Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline  
of Attorneys, and other Illinois law and practices that pertain to the proceeding;

8. The full name, business address and ARDC number of the Illinois attorney  
with whom I have associated in the matter is:

Jennifer Cassel  
Earthjustice  
311 S. Wacker Dr., Suite 1400  
Chicago, IL 60606  
ARDC Number: 6296047  
Filed appearance in R2020-019 on April 6, 2020

9. I certify that I have served this Statement upon the Illinois Pollution Control  
Board, the Attorney Registration and Disciplinary Commission of the Supreme Court of  
Illinois, and the Service List for Case No. R2020-019, and that these parties are all entitled  
to service under this rule.

Verification

I verify the accuracy and completeness of each of the above statements.

Dated: July 16, 2020

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'ML', is written over a horizontal line.

Melissa Legge

Earthjustice

48 Wall Street, 15<sup>th</sup> Floor

New York, NY 10005

212) 823-4978 (phone)

(212) 918-1556 (fax)

[mlegge@earthjustice.org](mailto:mlegge@earthjustice.org)

*Attorney for Prairie Rivers  
Network*

**CERTIFICATE OF SERVICE**

The undersigned, Jennifer L. Cassel, an attorney, certifies that I have served by email the Clerk and by email the individuals with email addresses named on the Service List provided on the Board's website, available at <https://pcb.illinois.gov/Cases/GetCaseDetailsById?caseId=16858>, a true and correct copy of the **APPEARANCE AND CONSENT TO EMAIL SERVICE OF MELISSA LEGGE** and **VERIFIED STATEMENT OF MELISSA LEGGE**, before 5 p.m. Central Time on July 16, 2020. The number of pages in the email transmission is 11 pages.

In addition, service to the Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois was completed via electronic mail to [rule707@iadc.org](mailto:rule707@iadc.org) on July 16, 2020.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Jennifer L. Cassel", is written over a light blue rectangular background.

Jennifer Cassel (IL Bar No. 6296047)  
Earthjustice  
311 S. Wacker Dr., Suite 1400  
Chicago, IL 60606  
(312) 500-2198 (phone)  
[jcassel@earthjustice.org](mailto:jcassel@earthjustice.org)

*Attorney for Prairie Rivers Network*

<b><u>SERVICE LIST</u></b>	
<p>Don Brown Clerk of the Board <a href="mailto:Don.brown@illinois.gov">Don.brown@illinois.gov</a> Vanessa Horton, Hearing Officer <a href="mailto:Vanessa.Horton@illinois.gov">Vanessa.Horton@illinois.gov</a> Illinois Pollution Control Board James R. Thompson Center Suite 11-500 100 West Randolph Chicago, Illinois 60601</p>	<p>Rex L. Gradeless <a href="mailto:Rex.Gradeless@illinois.gov">Rex.Gradeless@illinois.gov</a> Illinois Environmental Protection Agency 1021 N. Grand Ave., East, P.O. Box 19276 Springfield, Illinois 62794-9276</p>
<p>Virginia I. Yang - Deputy Counsel <a href="mailto:virginia.yang@illinois.gov">virginia.yang@illinois.gov</a> Nick San Diego - Staff Attorney <a href="mailto:nick.sandiego@illinois.gov">nick.sandiego@illinois.gov</a> Robert G. Mool <a href="mailto:bob.mool@illinois.gov">bob.mool@illinois.gov</a> Paul Mauer - Senior Dam Safety Eng. <a href="mailto:Paul.Mauer@illinois.gov">Paul.Mauer@illinois.gov</a> Renee Snow - General Counsel <a href="mailto:renee.snow@illinois.gov">renee.snow@illinois.gov</a> Illinois Department of Natural Resources One Natural Resources Way Springfield, IL 62702-1271</p>	<p>Matthew J. Dunn, Chief <a href="mailto:mdunn@atg.state.il.us">mdunn@atg.state.il.us</a> Stephen Sylvester Sr. Asst. Attorney General <a href="mailto:ssylvester@atg.state.il.us">ssylvester@atg.state.il.us</a> Andrew Armstrong, Chief <a href="mailto:aarmstrong@atg.state.il.us">aarmstrong@atg.state.il.us</a> Kathryn A. Pamerter <a href="mailto:KPamerter@atg.state.il.us">KPamerter@atg.state.il.us</a> 69 West Washington Street, Suite 1800 Chicago, IL 60602</p>
<p>Deborah Williams Regulatory Affairs Director <a href="mailto:Deborah.Williams@cwlp.com">Deborah.Williams@cwlp.com</a> City of Springfield Office of Utilities 800 E. Monroe, 4th Floor Municipal Building East Springfield, IL 62757-0001</p>	<p>Kim Knowles <a href="mailto:Kknowles@prairierivers.org">Kknowles@prairierivers.org</a> Andrew Rehn <a href="mailto:Arehn@prairierivers.org">Arehn@prairierivers.org</a> 1902 Fox Dr., Ste. 6 Champaign, IL 61820</p>
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<p>Keith Harley <a href="mailto:kharley@kentlaw.edu">kharley@kentlaw.edu</a> Daryl Grable <a href="mailto:dgrable@clclaw.org">dgrable@clclaw.org</a> Chicago Legal Clinic, Inc. 211 W. Wacker, Suite 750 Chicago, IL 60606</p>	<p>Michael Smallwood <a href="mailto:Msmallwood@ameren.com">Msmallwood@ameren.com</a> 1901 Choteau Ave. St. Louis, MO 63103</p>

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<p>Mark A. Bilut  <a href="mailto:Mbilut@mwe.com">Mbilut@mwe.com</a>                  McDermott, Will &amp;                  Emery 227 W. Monroe                  Street Chicago, IL 60606-</p>	<p>Abel Russ, Attorney  <a href="mailto:aruss@environmentalintegrity.org">aruss@environmentalintegrity.org</a>                  Environmental Integrity Project                  1000 Vermont, Ave NW, Ste. 1100                  Washington, DC 20005</p>
<p>Susan M. Franzetti  <a href="mailto:Sf@nijmanfranzetti.com">Sf@nijmanfranzetti.com</a> Kristen                  Laughridge Gale  <a href="mailto:kg@nijmanfranzetti.com">kg@nijmanfranzetti.com</a>                  Vincent R. Angermeier  <a href="mailto:va@nijmanfranzetti.com">va@nijmanfranzetti.com</a>                  Nijman Franzetti LLP                  10 S. Lasalle St., Ste. 3600                  Chicago, IL 60603</p>	<p>Alec M Davis,                  Executive Director  <a href="mailto:adavis@ierg.org">adavis@ierg.org</a>                  Kelly Thompson  <a href="mailto:kthompson@ierg.org">kthompson@ierg.org</a>                  IERG                  215 E. Adams St.                  Springfield, IL 62701</p>
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<p>Alisha Anker, Vice President,                  Regulatory &amp; Market Affairs  <a href="mailto:aanker@ppi.coop">aanker@ppi.coop</a>                  Prairie Power Inc.                  3130 Pleasant Runn                  Springfield, IL 62711</p>	<p>Chris Newman  <a href="mailto:newman.christopherm@epa.gov">newman.christopherm@epa.gov</a>                  U.S. EPA, Region 5                  77 West Jackson Blvd.                  Chicago, IL 60604-3590</p>



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<p>Kiana Courtney <a href="mailto:KCourtney@elpc.org">KCourtney@elpc.org</a> Environmental Law &amp; Policy Center 35 E. Wacker Drive, Suite 1600 Chicago, Illinois 60601</p>	<p>Christine M. Zeivel <a href="mailto:Christine.Zeivel@illinois.gov">Christine.Zeivel@illinois.gov</a> Rex Gradeless Rex.Gradeless@illinois.gov Stefanie Diers Stefanie.Diers@illinois.gov Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p>
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**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Melissa Anne Legge** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 4<sup>th</sup> day of April 2018, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on May 28, 2020.



*Aprilanne Agostino*

Clerk of the Court

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