

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 January 7, 2021, I caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, Johns Manville’s Supplemental Motion to Correct the Corrected Transcript of October 29, 2020 Hearing, a copy of which is attached hereto and herewith served upon you via e-mail.

JOHNS MANVILLE

By:  /s/ Kristen L. Gale

Dated: January 7, 2021

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that a true copy of the foregoing Johns Manville's Supplemental Motion to Correct the Corrected Transcript of October 29, 2020 Hearing was filed on January 7, 2021 with the following:

Don Brown, Clerk  
Illinois Pollution Control Board  
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and that true copies were emailed on January 7, 2021 to the parties listed on the foregoing Service List.

/s/ Kristen L. Gale

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>JOHNS MANVILLE, a Delaware corporation</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>PCB No. 14-3</b>
	)	<b>(Citizen Suit)</b>
	)	
<b>ILLINOIS DEPARTMENT OF</b>	)	
<b>TRANSPORTATION,</b>	)	
	)	
<b>Respondent.</b>	)	

**JOHNS MANVILLE’S SUPPLEMENTAL MOTION TO CORRECT  
THE CORRECTED TRANSCRIPT OF OCTOBER 29, 2020 HEARING**

Pursuant to 35 Ill. Adm. Code 101.604, Complainant Johns Manville (“JM”), by its undersigned counsel, submits to the Hearing Officer this Supplemental Motion to correct the transcript for the October 29, 2020 hearing date. On November 25, 2020, JM filed a Motion to Correct the October 29, 2020 Hearing Transcript. On December 15, 2020, the Clerk of the Pollution Control Board filed a Corrected Transcript. On January 4, 2021 the Hearing Officer granted JM’s Motion. Further review of the October 29, 2020 transcript, and the Corrected Transcript filed on December 15, 2020, revealed additional errors that require correction, otherwise material prejudice will result. JM has confirmed that Respondent, the Illinois Department of Transportation (“IDOT”) does not object to this Motion. The requested corrections in this Motion to Correct the Corrected October 29, 2020 Hearing Transcript supersedes the requested corrections in the Motion filed on November 25, 2020.

Importantly, JM notes that pages 147 to 151 of the transcript are confusing and unclear on the party asking the questions. It also appears that there is some testimony missing, including potentially the exhibits IDOT moved into evidence. The Corrected Transcript filed on December 15, 2020 does appear to correct these errors and omissions. This observation is further supported by the failure of the Corrected Transcript to correct all of the incorrect words “45” to the correct

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word “of.” Notably, while the Corrected October 29, 2020 Hearing Transcript does not appear to correct the errors identified in JM’s Motion to Correct the Transcript, the transcript has shifted every line by one. JM requests that the Hearing Officer request that the Court Reporter listen to the recording for this section of the hearing to correct the transcript. Also, because of numerous errors in the transcript after the “correction”, JM requests that the Court Report provide the recording of the October 29, 2020 Hearing to the parties so they too can further correct the transcript, otherwise material prejudice will result for both parties. JM further requests that the October 29, 2020 Transcript filed on November 5, 2020 and the Corrected Transcript of October 29, 2020 filed on December 15, 2020 be stricken from the record to remove confusion.

Page No.	Line No.	Now Reads	Requested Correction
4	5	We’re in the middle 45 cross-examination	We’re in the middle <b>of</b> cross-examination
4	24	and south side 45 site	and south side <b>of</b> site
5	7	45 site 6 halfway between	<b>of</b> site 6 halfway between
5	13-14	And you applied these Site 6 test pit borings using scaling off 45 a pdf,	And you applied these Site 6 test pit borings using <b>hand</b> scaling off <b>of</b> a pdf
5	20	45 that page, that might help you	<b>of</b> that page, that might help you
5-6	24-1	So, did you use this C-0022JM004753, which was hearing 6699,	So, did you use this C- <b>0022J, M004753</b> , which was hearing <b>66-99</b>
6	7	This says this was AE Con’s	This says this was <b>AECOM’s</b>
6	12-12	670-1 is the final removal of as per plan, correct?	<b>67-1</b> is the <b>Final Removal Action Work</b> plan, correct?
6	15	And if you could turn to 675-36	And if you could turn to <b>67-536</b> .
7	2	Can you tell me when you get to 57-536	Can you tell me when you get to <b>67-536</b>
7	5	fine plan, and you	<b>final</b> plan, and you
7	17	Instead 45 using this document	Instead <b>of</b> using this document
7	19	distances off a paper pdf off from an earlier	distances off a paper pdf from an earlier
8	3	line on site 3, a claim corridor was	line on site 3, a <b>clean</b> corridor was
8	7	This is part 45 your expert report	This is part <b>of</b> your expert report
8	17	D3-15 and D3C	<b>B3-15</b> and <b>B3-16</b>
8	18	Were those built in line with the hearing?	Were those <b>both identified in</b> the hearing?
9	2	drawing and some of the borings	<b>decision</b> and some of the borings

Page No.	Line No.	Now Reads	Requested Correction
9	4	45.	<b>of.</b>
9	6	calculated as your denomination,	calculated as your <b>denominator</b>
9	21	is accurate, then your numerator	is <b>inaccurate</b> , then your numerator
10	1	the division 45 a numerator	the division <b>of</b> a numerator
10	24	the bottom 45 that page, and I'm	the bottom <b>of</b> that page, and I'm
11	2	length along the south side 45 Site 6	length along the south side <b>of</b> Site 6
11	15	about the North Shore gas was line.	about the North Shore gas line.
11	18-20	to read into the record, "It's my understanding that a total 452,500 linear feet of the North Shore gas line was removed on Site 6."	to read into the record, " <b>It is</b> my understanding that a total of <b>2005 lineal</b> feet of the <b>NSG line</b> was removed on Site 6."
11	24	south side 45 Site 645 that measurement,	south side <b>of</b> Site 6 <b>of</b> that measurement,
12	10	45 it, correct, the 72 feet?	<b>of</b> it, correct, the 72 feet?
12	15	that was measured off 45 this base map,	that was measured off <b>of</b> this base map
12	17	North Shore gas?	North Shore gas <b>line</b> ?
13	6-7	North Shore gas and site 6 for North Shore gas.	North Shore gas <b>line</b> and site 6 for North Shore gas <b>line</b> .
14	14	You measured it in, but it whether	You measured it in, but whether
16	4	45 a deposition transcript.	<b>of</b> a deposition transcript.
17	7	This northeast excavation is comprised 45	This northeast excavation is comprised <b>of</b>
17	11-12	is based opinion measurements you made off 45 this map	is based <b>upon</b> measurements you made off <b>of</b> this map
17	17	it's also measured off 45 this map	it's also measured off <b>of</b> this map
17	20-21	boring B350 in your IDOT area 45 liability	boring <b>B3-50</b> in your IDOT area <b>of</b> liability
18	24	45, page 28, line 11	<b>of</b> , page 28, line 11
19	20	excavation 45 an entire grid	excavation <b>of</b> an entire grid
19	24	grid 45 B350 or B345 in your IDOT	grid <b>of B3-50</b> or <b>B3-45</b> in your IDOT
20	12	Was B346 a	Was <b>B3-46</b> a
20	16	I'll represent that B346 was a	I'll represent that <b>B3-46</b>
21	8	45 this, but	<b>of</b> this, but
21	16	I have a copy 45 it here.	I have a copy <b>of</b> it here.
21	19-20	to Bill Bell at LSR and Dr. Dr. Ebihara	To Bill <b>Bow</b> at <b>LFR</b> , and Dr. Ebihara
21	22-23	And on 123, USEPA says, quote, "To determine the extent 45 ACM,	And on <b>120-3</b> , USEPA says, quote, "To determine the extent <b>of</b> ACM,
22	8	the boundary 45	the boundary <b>of</b>

Page No.	Line No.	Now Reads	Requested Correction
22	17	But you didn't count report 346	But you didn't count this <b>in your</b> report, <b>B3-46</b>
22	20	346 is in the	<b>B3-46</b> is in the
22	22	45 site soil excavation	<b>of</b> site soil excavation
23	4	You see B346 up	You see <b>B3-46</b> up
23	17	If it's plotted too far to the	If it's plotted too <b>far</b> to the
23	19	east, and less 45 it falls	east, and less <b>of</b> it falls
24	6	Then it's less 45 it is	Then less <b>of</b> it is
24	13-14	And like Mr. Dorgan, you agreed the report gas references drove that need to dewater	And like Mr. Dorgan, you agreed <b>that there were four task buckets that drove the</b> need to dewater
25	16	4521.7 percent?	<b>of</b> 21.7 percent?
25	19	four categories 45 dewatering	four categories <b>of</b> dewatering
25	24	so all four 45 these categories	so all four <b>of</b> these categories
26	2	I think if you look the 207-7, it	I think if you look <b>at</b> 207-7
26	9	I didn't treat any 45 those four	I didn't treat any <b>of</b> those four
26	19	destruction services came into utility work and comprised	<b>construction</b> services <b>payment for</b> utility work <b>that</b> comprised,
26	22	Footnote 1945	Footnote 19 <b>of</b>
27	7	were charged with linear	<b>returned to</b> linear
27	11	create a clean bore corridor	create a clean corridor
27	13	838 linear feet off 45 your map;	838 linear feet off <b>of</b> your map;
27	23	which you measured off 45 your	which you measured off <b>of</b> your
28	5	your attributions divided as	your attributions <b>you</b> divided <b>197</b>
28	8	cost total 45 160,587	cost total <b>of</b> 160,587
28	15	on the site green, six	on the site <b>3</b> , six
28	18-19	Site 3 work, along for dewatering in Site 6	Site 3 work alone for dewatering, <b>and</b> Site 6
29	12-14	an allocation 45 zero for the ramp 7 because you thought it was too far west on parcel 039	an allocation <b>of</b> zero for the ramp because you thought it was too far west on parcel <b>0393</b>
30	17	ACM was found 45 --	ACM was found <b>in</b> --
30	22-23	for B350 or B345	for <b>B3-50</b> or <b>B3-45</b>
31	5	just a portion 45 that;	just a portion <b>of</b> that;
31	1-13	So we're back again to that calculation 455,470 feet, which is the entire length 45 the north side and south side 45 Site 6	So we're back again to that calculation <b>of</b> 5,470 feet, which is the entire length <b>of</b> the north side and south side <b>of</b> Site 6
32	1	and south side 45 Site 6?	and south side <b>of</b> Site 6?
32	3	And your metric denominator	And your <b>measured</b> denominator
32	9	And that's measured off 45 your	And that's measured off <b>of</b> your
32	13	volume 45 filling in any way, shape 45 form,	volume <b>of</b> filling in any way, shape, <b>or</b> form,
32	20	alone and Site 61	alone and Site <b>6</b>

Page No.	Line No.	Now Reads	Requested Correction
33	4-6	You stated that you used the same zero approach as Mr. Dorgan for general site preparation work.	You stated that you used the same <b>general</b> approach as Mr. Dorgan for general site preparation work.
33	10	identify which gas buckets	identify which <b>task</b> buckets
33	20	IDOT sent it to you ahead 45 time.	IDOT sent it to you ahead <b>of</b> time.
34	5-7	And construction service in this process are 54 -- is half of line AT&T Nicor gas; is that right?	And construction <b>services task buckets</b> in this <b>category</b> are the <b>Waukegan Water line, AT&amp;T, Nicor Gas, Northshore gas, Northeast excavation, dewatering, ramp and filling and capping</b> ; is that right?
35	17	45204-32, and here	<b>of</b> 204-32, and here
36	4	work categories of gas	work categories of <b>task</b>
36	14	45207-8?	<b>of</b> 207-8?
36	19	for example, the Waukegan water	for example, <b>if</b> the Waukegan water
37	1-3	that all 45 these tasks are in Site 3 prep, Site 6, Site 3 and 6 prep, compensate in Site 3 oversight and Site 6 oversight and legal,	that all <b>of</b> these <b>Tasks in</b> Site 3 Prep, Site 6 <b>Prep</b> , Site 3 and 6 Prep, <b>Health and Safety</b> , Site 3 oversight, and Site 6 oversight and legal, all depend upon the
37	5	various task methods that we just went through?	various task <b>buckets</b> that we just <b>went</b> through?
37	22	I'm just trying to cut through the chase	I'm just trying to cut <b>to</b> the chase
39	12	is doing her redirect 45	is doing her redirect <b>of</b>
40	6	subsurface characterizations 45 Site 3	subsurface characterizations <b>of</b> Site 3
40	14	photograph that begins at 5550 grid?	<b>paragraph</b> that begins a <b>50x50</b> grid?
40	17	"The 5550 grid	"The <b>55x50</b> grid
41	3	could read the top 45 this	could read the top <b>of</b> this
41	7	this map in preparation 45	this map in preparation <b>of</b>
41	14	go to 57-2087.	go to <b>57-287</b>
41	18	location D315	location <b>B3-15</b>
42	15	I don't recall off the top 45 my head.	I don't recall off the top <b>of</b> my head.
43	5	transite 5 and the remaining as concrete salt paper,	transite <b>pipe</b> and the remaining as concrete <b>felt</b> paper,
43	12	bore samples drilled	<b>core</b> samples drilled
43	13	Board Order didn't site	Board Order <b>cited</b>
43	19	206, which is	<b>6</b> , which is
43	22	If you could turn to 0625	If you could turn to <b>6-25</b> .



Page No.	Line No.	Now Reads	Requested Correction
44	2	Can you go to the bottom 45 this	Can you go to the bottom <b>of</b> this
44	18	Exhibit 0625 --	Exhibit <b>6-25--</b>
44	23	the first stage 45 this matter?	the first stage <b>of</b> this matter?
45	1	, which is 0625	, which is <b>6-25</b>
45	8	Objection, lack 45 foundation	Objection, lack <b>of</b> foundation
46	5	construction 45 Detour Road A.	construction <b>of</b> Detour Road A.
46	22	It's letting out	It's <b>setting</b> out
47	10	cross-section in the GASK bulletin --	cross-section in the <b>as-built</b> --
47	22	your first round 45 hearing	your first round <b>of</b> hearing
48	7	to 7 plus general general	to 7 plus general
48	10	457?	<b>of 7?</b>
49	7	and future grade 45 Greenwood	and future grade <b>of</b> Greenwood
49	21	future grade 45 both	future grade <b>of</b> both
50	5	the beginning 45 excavation.	the beginning <b>of</b> excavation
50	15	190 square yards 45	190 square yards <b>of</b>
50	22	east 457 plus 60?	east <b>of</b> 7 plus 60?
50	24	to the east 457 plus 60.	to the east <b>of</b> 7 plus 60.
51	7	45 station --	<b>of</b> station --
51	11	slightly west 455S.	slightly west <b>of</b> 4S.
51	17	to USEPA regarding ECB cleanups.	to USEPA regarding <b>PCB</b> cleanups.
51	23	the report wit comments,	the report <b>with</b> comments,
52	15	Exhibit 2452	Exhibit <b>202</b>
52	18	creating a bass	creating a <b>base</b>
53	5	there is a lot 45 information on this,	there is a lot <b>of</b> information on this,
53	16	the viewing 45 figures	the viewing <b>of</b> figures
54	4	second round 45 hearings	second round <b>of</b> hearings
54	15	the same layout 45 this	the same layout <b>of</b> this
54	17	I'm lock being at	I'm <b>looking</b> at
56	7	to this round 45 hearing,	to this round <b>of</b> hearing,
57	11	, did AE Con that	, did <b>AECOM</b> that did
57	19	concept 45 the next clay boring all the way to halfway to the next cleanest boring	concept <b>of</b> the next <b>cleanest boring -- going halfway to the next clean boring.</b>
58	4	, in terms 45 boring	, in terms <b>of</b> boring
58	8	in some 45 your	in some <b>of</b> your
58	18	this sort 45 staggered	this sort <b>of</b> staggered
58	19	, in this process 45 going	, in this process <b>of</b> going
59	14	February 6 <sup>th</sup> , 2019	February 6, <b>2010.</b>
60	23-24	you have to mediate until you find a playing forum?	you have to <b>remediate</b> until you find a <b>clean boring?</b>
61	4	the next planned	the next <b>clean</b>

Page No.	Line No.	Now Reads	Requested Correction
61	16	reliable, not	<b>liable</b> , not
61	17	Irrespective 45 whether	Irrespective <b>of</b> whether
61	23	you spent a lot 45	you spent a lot <b>of</b>
61:1	62:1	, a lot 45 witnesses, a lot 45 effort	, a lot <b>of</b> witnesses, a lot <b>of</b> effort
62	13	It shows the layout 45 the	It shows the layout <b>of</b> the
63	1-2	economic impact 45 these different site boundaries for purposes 45	economic impact <b>of</b> these different site boundaries for purposes <b>of</b>
63	16	And in terms 45 figuring out	And in terms <b>of</b> figuring out
63	23	What kind 45	What kind <b>of</b>
64	16	the Board found any other attorney liable,	the Board found any other <b>party</b> liable,
64	19	Board consider culpability 45 any	Board consider culpability <b>of</b> any
65	4	esbestos-containing	<b>asbestos</b> -containing
65	6	outside of the scope 45 this	outside of the scope <b>of</b> this
65	7	THE WITNESS:	<b>MS. O'LAUGHLIN:</b>
65	15	Did the Board the source	Did the Board <b>consider</b> the source
66	2	Okay, 16 Ms. Brice,	Okay, Ms. Brice,
66	10	Ms. Brice, you pay proceed.	Ms. Brice, you <b>may</b> proceed.
67	18	at least two sort 45 construction	at least two <b>sorts of</b> construction
69	5-7	comes in here east 457.60, does it not, and abuts Greenwood Avenue east of 457.60 around – it looks like station 7, 6 and 5.50 on this video	comes in here east <b>of 7+60</b> , does it not, and abuts Greenwood Avenue east <b>of 7+60</b> – it looks like Stations 7,6, and <b>5+50</b> on this <b>figure</b> .
69	11	these were Atwell's	these were <b>as-built</b> s
69	12	These figures are based 45	These figures are based <b>off of</b>
69	21	goes beyond the parameters 45 this second round 45	goes beyond the parameters <b>of</b> this second round <b>of</b>
69	24	the first round 45 hearing,	the first round <b>of</b> hearing,
70	2	to this second round 45 hearings.	to this second round <b>of</b> hearings.
70	8	When you are dealing with at	When you are dealing with <b>an</b>
70	15	And take a look here at 21A 26A-1,	And take a <b>look</b> here at <b>21A-26A</b> ,
70	22-23	there appears to be no exchanges to the more-information	there appears to be no <b>changes</b> to the <b>for-information</b> -only
73	7	Looking at 0441A, 7S, and	Looking at <b>204-41A</b> , 7S, and
73	12-13	Yes, they were based upon borings and relationship.	Yes, they were based upon <b>boring logs</b> .
73	16-17	Yes, they give you an idea of what to when you expected the encounter, yes.	Yes, they give you an idea of what <b>you would expect to</b> encounter, yes.
73	20-21	It varies, because a lot 45 times – a lot 45 work	It varies, because a lot <b>of</b> times – a lot <b>of</b> work
74	1	Atwell drawings	<b>as-built</b> drawings

Page No.	Line No.	Now Reads	Requested Correction
74	15	that give salt borings	that <b>gave some</b> borings
74	24	Would with those found in 21A-26.	<b>Where would those be</b> found in 21A-26?
75	2	plans because they were part 45 it.	plans because they were part <b>of</b> it.
75	9-10	There's nothing that shows that there's anything there.	<b>Insert Line Break.</b> A. There's nothing that shows that there's anything there.
75	15	Were brace used for other miscellaneous	JM requests that
76	2	engineering utilization 45 that	engineering utilization <b>of</b> that
76	19	45 maps with the EPA,	<b>of</b> maps with the EPA,
77	4	providing comments on the eca.	providing comments on the <b>EECA.</b>
78	19	part 451JMs theory	part <b>of</b> JM's theory
78	20	theory in the first round 45 hearings	theory in the first round <b>of</b> hearings
79	15	the discussion 45 detour	the discussion <b>of</b> detour
79	24	the cross-section 45	the cross-section <b>of</b>
83	24	45 you?	<b>of</b> you?
82	5	expert rebuttal report 45	expert rebuttal report <b>of</b>
83	7	264, please	<b>206-4</b> , please
83	11-12	for attributing being costs."	for attributing costs."
83	13	respect to both 45 his	respect to both <b>of</b> his
83	17	He just used different forms 45	He just used different forms <b>of</b>
83	18	measurement for different gas buckets	measurement for different <b>task</b> buckets
84	4	Not necessary.	Not <b>necessarily.</b>
84	5	You say on the bottom 45206-4	You say on the bottom <b>of</b> 206-4
85	3-4	An example would be the North Shore GASK line in the main corridor	An example would be the North Shore <b>Gas</b> line <b>and the clean</b> corridor
85	7	the North Shore GASK line	the North Shore <b>Gas</b> line
85	20	liability to the immediately around	liability to the <b>area</b> immediately around
86	18-18	representative of a after larger area."	representative of a larger area."
86	24	representative sample 45 a geographical	representative sample <b>of</b> a geographical
87	4	Whereas, Mr. Gobelman arced out the area	Whereas, Mr. Gobelman <b>marked</b> out the area
87	7	And here on 2069,	And here on <b>206-9</b>
87	14	were they were	<b>where</b> they were
88	4	I'll respect to you	I'll <b>represent</b> to you
88	7	If you would like it take a	If you would like <b>to</b> take a

Page No.	Line No.	Now Reads	Requested Correction
88	14	that started with face map	that started with <b>Base</b> map
88	18	USEPA approved AE Con	USEPA approved <b>AECOM</b>
89	1	boards here 45208-9 and	boards here <b>of</b> 208-9 and
89	7	the northeast section 45208-9?	the northeast section <b>of 208-9?</b>
89	11	ledge that AE Con Consultan Group agreed on?	<b>boundaries that we and AECOM Consultants</b> Group agreed on.
89	19	Ms. Dutton your cad person?	Ms. Dutton your <b>CAD</b> person?
90	4	AE Com's drawings.	<b>AECOM's</b> drawings.
90	10	You have state claim coordinates	You have state <b>plane</b> coordinates
90	14	You have a couple 45 --	You have a couple <b>of</b> --
90	15-16	excavation teste samples, 1S to 8S, per AE Con, document 7536	excavation <b>test</b> samples, 1S to 8S, per <b>AECOM document 67-536.</b>
91	1	-- from one 45 your	-- from one <b>of</b> your
91	8	was just brought up last month.	was just brought up <b>this morning.</b>
91	15	locations 45 the test	locations <b>of</b> the test
91	18	"AOM boring location 1999."	<b>"ELM boring location (1999)."</b>
91	22	performed by ACM.	<b>positive for ACM.</b>
92	3	the AE Com drawing	the <b>AECOM</b> drawing
92	6-7	between Northern AE Con's locations	between <b>Dorgan and AECOM's</b> locations
92	10	location 45 Mr. Gobelman's	location <b>of</b> Mr. Gobelman's
92	15	boundary 45 site	boundary <b>of</b> site
92	17-19	So, I ended up moving these borings logs and also moved the features including the northeast excavation	So, <b>he</b> ended up moving these <b>boring locations</b> and also moved the features including the northeast excavation
93	3	His increasing are placed	His <b>borings</b> are placed
93	7	to yours in AE Con's?	to yours and <b>AECOM's?</b>
94	21	the northern boundary 45 site 3.	the northern boundary <b>of</b> site 3.
95	6-8	which would stand for a found iron pipe. It's like 3 boundary after the corrections appear to line up closely with that particular linear feature.	which would stand for found iron pipe. <b>The Site 3 boundaries</b> , after the corrections, appear to line up closely with that particular linear feature.
95	9	And what does found irone pipe	And what does found <b>iron</b> pipe
95	12	to designate some sort 45 boundary.	to designate some sort <b>of</b> boundary.
95	21	he did scaling off 45	he did scaling off <b>of</b>
96	17	He shifted it from the disperse one,	He shifted it from the <b>first</b> one,
97	2	that location 45	that location <b>of</b>
98	13	sample locations 45 representative	sample locations <b>are</b> representative
98	19	entire 5550	entire <b>50x50</b>
98	22	all 450393 was	All <b>of</b> 0393 was

Page No.	Line No.	Now Reads	Requested Correction
99	3	was in control 45 all 45 parcel 0393.	was in control <b>of</b> all <b>of</b> parcel 0393.
99	15	include 0393 as part 45 IDOT's	include 0393 as part <b>of</b> IDOT's
99	17	It limited it for certain gas buckets.	It limited it for certain <b>task</b> buckets.
99	19	failed to rebut your points concerning IDOT area 45	<b>failure</b> to rebut your points concerning IDOT area <b>of</b>
100	3-5	and then what that role IS, in terms of the rest of the work on Site 6, and also consider the plans that we've looked	and then what <b>their</b> role <b>is</b> , in terms of the rest of the work on Site 6, and also <b>considered</b> the plans that we've looked <b>at</b>
100	9	at the intersection 45 D4 road A	at the intersection <b>of detour</b> road A
101	7	right-45-way.	right- <b>of</b> -way.
102	10	look at 21A and 26,	look at <b>21A-26</b>
102	14-15	a bit and 21A-26 and	a bit <b>at 21A-26</b> and
103	5-6	the point 45 this document 21A, 26B	the point <b>of</b> this document <b>21A-26</b>
103	12	that are reflected in gas 7S where	that are reflected in 7S where
104	1	between as-built plans	between <b>as-built</b> plans
106	4	figure that has a peat marked	figure that has peat marked
106	19	State 7S?	<b>sample</b> 7S?
109	1	-- you've at boring logs	-- you've <b>looked</b> at borings logs
109	3	Is there any mention 45 black	Is there any mention <b>of</b> black
109	23	debris found them?	debris found <b>in</b> them?
110	2	And I would say 100 percent	And I would <b>not</b> say 100 percent
110	5	most important aspect 45 Mr.	most important aspect <b>of</b> Mr.
110	17-19	If the base map Mr. Gobelman is using is inaccurate correct, what does that mean for the work required by USEPA?	If the base map Mr. Gobelman is using is <b>inaccurate</b> , <b>what</b> does that mean for the work required by USEPA?
111	1	And we've gone though before	And we've gone <b>through</b> before
111	4	If you could to 207-18 please	If you could <b>turn</b> to 207-18 please
111	8	Mr. Gobelman do you used this	Mr. Gobelman used this
111	15-16	at lease onto only part of the northeast excavation that's is had parcel 0393.	<b>to</b> only part of the northeast excavation that's <b>a part of</b> parcel 0393.
112	2-3	Yes, it references undergraduate electric lines runs along 1S	Yes, it references <b>underground</b> electric lines <b>that run</b> along 1S
112	8	, does a comment fiber	, does a <b>ComEd</b> fiber
113	1	Do you believe Mr. Gorgan has placed the NRP's observations in the correct place?	Do you believe Mr. <b>Gobelman</b> has placed the <b>Northeast excavation</b> in the correct place?
113	5	easted, how does	<b>east</b> , how does

Page No.	Line No.	Now Reads	Requested Correction
113	15-16	you believe the Washington water line is in the big pond location	you believe the <b>Waukegan</b> water line is in the <b>wrong</b> location
114	5	long the Waukegan water line	the Waukegan water line
114	11	, he divided 129 by 1060,	, he divided <b>199</b> by 1060,
115	21-23	They said that the lines for a segment of Site 6 in our ground when on poles for the rest 45 line on Site 6.	They said that the lines for a segment of Site 6 <b>were underground then</b> on poles for the rest <b>of the lines</b> on Site 6.
116	16	length 45 the lines	length <b>of</b> the lines
116	20	enumerator here on	<b>numerator</b> here on
117	6	where the line came out 45 Site	where the line came out <b>of</b> Site
117	17-18	That clean borders were created along the entire length 45 site 6 on both the north and south	That clean <b>corridors</b> were created along the entire length <b>of</b> site 6 on both the north and south
118	5	he used to calculates the	he used to <b>calculate</b> the
118	17	-- the actual location 454S.	-- the actual location <b>of</b> 4S.
118	22	the North Shore line on	the North Shore <b>gas</b> line
118	23	Can you just explain the nature 45 your	Can you just explain the nature <b>of</b> your
119	10	, there was no ACM east of 458S.	, there was no ACM east <b>of</b> 8S.
119	21	So, it was the presence 45 ACM	So, it was the presence <b>of</b> ACM
120	9	That did you say?	<b>What</b> did you say?
120	11	entire length 45 the	Entire length <b>of</b> the
120	22	says the North Shore GASK lines run	says the North Shore <b>Gas line runs</b>
121	17	just west 454S.	just west <b>of</b> 4S.
122	11	sides 45 Site 6 to calculate his total area 45 work.	sides <b>of</b> Site 6 to calculate his total area <b>of</b> work.
123	5-6	in the northern 6 excavation	in the <b>northeast</b> excavation
123	18-19	south side 45 Site 6, the 419 linear fight feet.	south side <b>of</b> Site 6, the 419 linear feet.
123	22	IDOT's area 45	IDOT's area <b>of</b>
124	2	western edge 45 Site 6	western edge <b>of</b> Site 6
124	12	and south side 45	and south side <b>of</b>
125	22	Your method looked at the gas buckets	Your method looked at the <b>task</b> buckets
126	3	that lives in an area	that <b>is based on</b> area
126	15-16	what the driver was out of the Bush National Marine.	what the driver <b>for the remedy</b> was out of the <b>Enforcement Action Memo.</b>
127	9	and south 45 Site 6.	and <b>of</b> Site 6.
127	16	relay on measuring	<b>rely</b> on measuring
127	23	combined the Site 3 task bucket,	combined <b>Site 3 and 6</b> Task Bucket,

Page No.	Line No.	Now Reads	Requested Correction
128	1	down to the rest 45	down to the rest <b>of</b>
128	3-6	Turning here to demonstrative Exhibit 245, "Task buckets used to influent by those experts to determine oversight in support services tas bucket attribution."	Turning here to demonstrative Exhibit 245, "Task Bucket Used <b>As Inputs By Both Experts To Be Used To Determine Oversights And Support Services Task Bucket Attributions</b> "
128	10	same metrology we've	same <b>methodology</b> we've
128	13-14	IDOT's share 45 construction-related costs, all 45 his calculations	IDOT's share <b>of</b> construction-related costs, all <b>of</b> his calculations
129	1	Mr. Dorgan	<b>Mr. Gobelman</b>
129	11	, with respect to all 45 these	, with respect to all <b>of</b> these
129	14	oversight, oversight and legal;	oversight, <b>Site 6</b> oversight and legal;
129	16	A couple 45 last questions	A couple <b>of</b> last questions
130	15-16	you had relied on AEM to provide you a cad file in the production 45 your	you had relied on <b>AECOM</b> to provide you a <b>CAD</b> file in the production <b>of</b> your
130	22	on my depositions.	<b>in my deposition.</b>
131	15-16	We had produced it bridget format, and we showed we produced some 45 those	We had produced it <b>in pdf</b> format, and we showed we produced some <b>of</b> those
132	6	that's created in side the	that's created <b>inside</b> the
132	10	this second round 45 hearings?	this second round <b>of</b> hearings?
133	17	And all those dates tells occur	And all those dates occur
134	3	between the AE Con	between the <b>AECOM</b>
134	14	, and AE Con's	, and <b>AECOM's</b>
134	24	Is that an accurate description 45 this	Is that an accurate description <b>of</b> this
135	3	And when some 45 these match	And when some <b>of</b> these match
135	5	On this Figure B345	On this Figure <b>B3-45</b>
135	10	included 345	included <b>B3-45</b>
135	12	through the exercise 45	through the exercise <b>of</b>
135	14	that he had used AE Con's facts	that he had used <b>AECOM's</b> facts
135	23	Do you include	<b>Did</b> you include
136	10	45 -- it begins	<b>of</b> -- it begins
136	22	was referred AE Con.	was <b>prepared by AECOM.</b>
136	23	But you do not agree with that?	But you do not <b>have a cite</b> with that?
137	13	that would have prepared by me.	that would have <b>been reviewed</b> by me.
137	20	45 this entire case,	<b>of</b> this entire case,

Page No.	Line No.	Now Reads	Requested Correction
138	7	embankment that the present on	embankment that <b>is</b> present
138	14	discussed in the AE Con	discussed in the <b>AECOM</b>
139	19	I kind 45 lost it.	I kind <b>of</b> lost it.
140	17	driven by all 45 Site 3	driven by all <b>of</b> Site 3
141	6	And the clear corridors	And the <b>clean</b> corridors
141	11-12	I'll hand you what was disseminated as 21A-30	I'll hand you what was <b>described as 21B-30</b>
142	1	Road 8.	Road <b>A.</b>
142	2	the bottom part 45	the bottom part <b>of</b>
146	1	If you could foundation please	If you could please
147	11	With respect attributions clean	With respect <b>to</b> attributions <b>of</b> clean
149	1	, but at the bottom part 45 Figure	, but at the bottom part <b>of</b> Figure
149	8	221A and 226,	<b>21A-26A,</b>
149	14	And 221A and 226 was form the as-built	And <b>21A-26</b> and <b>21A-26A</b> was <b>from</b> the as-built
149	17	MS. O'LAUGHLIN:	MS. <b>BRICE:</b>
149	19	BY MS. BRICE:	BY MS. <b>O'LAUGHLIN:</b>
149	20	221A and 226;	<b>21A-26A;</b>
150	2	221A and 226 that	<b>21A-26A that</b>
150	8	2845646 was	<b>21A</b> was
150	11	is A21-26	is <b>21A-26</b>
150	21	, and they know what bore	, and they know what <b>for</b>
152	4	MS. BRICE:	MS. <b>GALE:</b>
147-151	ALL	JM notes that pages 147 to 151 of the transcript are confusing and unclear on the party asking the questions. It also appears that there is some testimony missing, including potentially the exhibits IDOT moved into evidence. JM requests that the Hearing Officer request that the Court Reporter listen to the recording for this section of the hearing to correct the transcript and also provide a copy of the recording to the parties, otherwise material prejudice will result.	

Respectfully submitted,  
Johns Manville

By: /s/ Kristen L. Gale  
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