

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

NOTICE OF FILING AND SERVICE

To: ALL PERSONS ON THE ATTACHED CERTIFICATE OF SERVICE

Please take note that today, June 21, 2016, Respondent, Illinois Department of Transportation, filed and served its "IDOT Amended Trial Exhibit List" with the Clerk of the Pollution Control Board, a copy of which are hereby served upon you.

Respectfully Submitted,

By: s/ Evan J. McGinley
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CERTIFICATE OF SERVICE

Johns Manville v. Illinois Department of Transportation, PCB 14-3 (Citizens)

I, EVAN J. MCGINLEY, do hereby certify that, today, June 21, 2016, I caused to be served on the individuals listed below, by electronic mail, a true and correct copy of Respondent, Illinois Department of Transportation's "IDOT Amended Trial Exhibit List."

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s/ Evan J. McGinley
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Johns Manville v. IDOT
 PCB NO. 2014-003
 IDOT Amended Trial Exhibit List (Revised 6-21-16)

No.	Exhibit Description
4A	Deposition of Douglas Dorgan with Exhibits, taken May 6, 3025
4B	Deposition of Douglas Dorgan with Exhibit, taken September 29, 2015
4C	Deposition of Steven Gobelman with Exhibits, taken July 10, 2015
4I	Exhibit to deposition of Fortunato, taken May 9, 2016. Trial exhibit pages 286 to 326
7	Affidavit of Douglas G. Dorgan dated February 15, 2016, attached to JM's Responses to IDOT's Motions in Limine
8	Expert Rebuttal Report of Steven L. Gobelman with appendices dated May 29, 2015
19	Excerpts from IDOT Standard Specification for Road and Bridge Construction dated January 2, 1971 (IDOT 001068-001103, IDOT 002654)
20	Notice to Bidders, Specifications, Proposed Contract and Contract Bond dated September 3, 1971 (JM 000604-000683)
21A	As Built IDPW Plans for Proposed Federal Aid Highway F.A. Route 437 – Section 8 – HB& i-VB Lake County (JM001132-001235)
21B	As Built IDPW Plans for Proposed Federal Aid Highway F.A. Route 437 – Section 8 – HB& i-VB Lake County (IDOT 003355-003447)
22	Letter from S. Ziejewski to W.E. Baumann dated September 24, 1970 (IDOT 000261)
23	Letter from H. Bonham to S. Ziejewski dated August 19, 1971 and attachments (IDOT 00275-00284)
24	Letter from W. Cellini to E. Bollander dated September 30, 1971 (IDOT 000260)
25	Letter to R. Schmidt to S. Ziejewski dated November 15, 1971 (IDOT 000247-000249)
26	Schedule of Prices (IDOT 000041-000063)
27	Letter to R. Golterman to E. Rosenberg dated December 7, 1971 (IDOT 000247-000249)
28	Letter to G. Moberly to R. Schmidt dated May 25, 1972 (IDOT 000137-000139)
29	Supervision Engineering Report dated October 17, 1972 (IDOT 000154)
30	Construction Audit [undated] (IDOT 000143-000144)
31	Memo and Authorization for Contract Changes dated October 19, 1972 (IDOT 000294-000300)
32	Authorization for Contract Changes dated November 14, 1973 (IDOT 000318-000319)
33	Explanation for Deviations from Contract (IDOT 000327-000328)
34	Letter to R. Schmidt from S. Ziejewski dated September 30, 1974 (IDOT 000109)

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35	Authorization for Contract Changes dated May 5, 1975 (IDOT 000329)
36	Job Completion Notice dated February 18, 1976 (IDOT 000075)
38	Letter and Resolution re Joint City State Improvement Route 137 dated October 20, 1965 (IDOT 000068-000074)
40	Letter and Resolution re Joint County State Improvement Route 137 dated April 7, 1966 (Exhibit 7 to Deposition of K. Stoddard)
41	Grant for Public Highway dated August 3, 1971 (IDOT 002808-002814)
42	Grant for Public Highway notarized January 16, 1974 (IDOT 002846-002853)
43	Letter to S. Ziejeswki from ComEd dated July 24, 1984 with attachment of Grant for Public Highway (IDOT 001031-001040)
44	Highway Jurisdiction Guidelines for Highway and Street Systems dated March 2006 (IDOT 011385-011524)
46	Revision of Title Commitment prepared for IDOT dated March 30, 2016 (IDOT 008160-008171/Exhibit F to IDOT's Rule 213(f)(3) Disclosure Statement for Keith W. Stoddard)
49	Access Agreement dated February 12, 2008 between JM and the City of Waukegan (JM 0006649-0006654)
50	License Agreements From Commonwealth Edison Company dated November 16, 1956 (JM 0007094-0007098) and dated November 1, 1961 (JM 0007099-007104), and Affidavit of Brent Tracy dated April 13, 2016
52	Photograph of Aerial Photo late 1950s (JM 001296)
53B	Aerial Photograph 1972 (JM0005826)
53K	Aerial Photograph 1974 (JM0005835)
53L	Aerial Photograph 1967 (JM0005836)
53P	Aerial Photograph 1939 (JM 0005840)
54A	Aerial Photograph 1939, (IDOT 2632)
54E	Aerial Photograph 1972, (IDOT 2636)
54Q	Aerial Photograph 10-26-72, (IDOT 2648)
54R	Aerial Photograph 10-26-72, (IDOT2649)
54S	Aerial Photograph 1970 (IDOT 002650)
54T	Aerial Photograph, 6-11-70, (IDOT 2651)
56	Emails between S. Gobelman and P. McQuillan dated December 16, 2013 and attached topographic maps (IDOT 003268-003277)
57	ELM Subsurface Characterization Report dated December 1999 (JM 000030-000580)
58	Letter from USEPA to K. Brown of IDOT and 104(e) Request Attachment dated September 29, 2000 (IDOT 000378-000391)

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59	IDOT Memo from E. Gower to K. Brown dated November 16, 2000 regarding 104(e) Request (IDOT 00393-00398)
60	IDOT 104(e) Response dated November 27, 2000 (JM 000581-000585)
62	Administrative Order on Consent dated June 11, 2007 (JM 001248-001282)
63	EE/CA Revision IV and all attachments, April 2011 by Arcadis (JM 001652-002370)
64	EE/CA Modification Letter dated February 1, 2012 (JM 002372-002399)
65	USEPA Enforcement Action Memorandum dated November 30, 2012 (JM 002423-002549)
66	Cover Letter and Removal Action Work Plan Revision II dated March 31, 2014 (JM 004655-005767)
67	Cover Letter and Removal Action Work Plan Revisions IV dated February 2016 and comparison with previous RAWP (JM 0006027-0006647)
71	Letter from Tat Ebihara to B. Tracy, De. Clinton dated January 25, 2016 with attachments (JM 0006019-006024)
73	Letter from USEPA to AECOM dated September 26, 2014 (JM 005791)
74	Letter to John Van Vranken from LFR with attachments dated July 8, 2008 (JM 001285-001293)
78	JM Response to 104(e) Request dated July 1, 1999 (JM 000011-000029)
80	Illinois beach State Park Final Report of Findings January 20, 2006 (JM 0005884-0005939)
84	Soil Boring Cross Sections Figures dated May 6, 2016 (JM 0007191-0007192)
90	Sidwell Maps 2014 (IDOT 012085-86)
92	Authorization for Contract Change dated 8/13/73 (IDOT 000315)
93	Request for Authorization dated 10/18/71; Document from W.E. Baumann relating to sewer Approval dated 10/28/71 (IDOT 000287-89)
94	Shoo Fly Road Proposal dated October 26, 1971 (IDOT 000223-226)
95	Engineer's Report dated 8/2/72 (IDOT 000171)
102	Second Five-Year Review Report prepared by USEPA for Johns Manville dated May 2, 2003 (former 2.i.)
104	Letter: W. Bow (ECOM to M. Ohl (USEPA) attaching Respondents Response Document to Engineering Evaluation/Cost Analysis (EE/CA), Revision 4, as Modified and Approved by USEPA; Southwestern Site Area, Waukegan, IL (Former 24) (JM 2400-2414)
107	Topographical Map, 1939, (Former 10C) (IDOT 003261)
108	Topographical Map, 1960, (Former 10D) (IDOT 003262)
109	Topographical Map, 1972 (Former 10E) (IDOT 003263)
120	USEPA Comments on Engineering Evaluation Cost Analysis Report Revision 1 dated February 3, 2010 (former 20) (JM 001446 to 1451)

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123	July 6, 2000 Email: Bruce Ray to Coyle Ann re: Waukegan Additional Site No. 3; documentation on parties excluded from enforcement (Former 25) (JM 002415)
129	AECOM Removal Action Work Plan for Southwestern Site Area, Sites 3m 4/5, and 6, Waukegan, Illinois (Former 33), Nov. 2013 (JM 2593-3724)
132	Southwestern Site Area, Sites 3,4/5 and 6 Removal Action Plan Scope of Work and Implementation Issues (Former 37) (JM 005814-21)
133	April 30, 1998 Letter: B. Bradley (USEPA) to D. Clinton (JM) re: Approval of Work Plan (Former 38) (JM 5841 to 5842)
140	Sept. 21, 1970 Memo from Sigmund Ziejewski to W.E. Berman re: Special Provisions to be adjusted for "Status of Utilities" (Former 45) (IDOT 962)
141	Nov. 10, 1971, Change Order for Special Excavation (former 47) (IDOT 221)
161	Feb. 18, 2008 Email: B. Tracey (Johns Manville) to Various Individuals cc: D. Clinton (former 55) (JM 7805)
162	Quitclaim Deed dated April 18, 1895 (former 56) (IDOT 12093)
163	Quitclaim Deed dated January 20, 1915 (former 57) (IDOT 12094)
164	Cross Section A-A; Cross Section B-Band Greenwood Avenue dated May 2016 (former 58) (IDOT 12082-84)
166	Memo: B. M. Borrud to Stahl Renwick and Mason Nicholson re: Agreement executed between City of Waukegan and State of Illinois dated April 20, 1966 (former 60) (IDOT 12116 to 12137)
167	Right of Way Notice Letter (former 61) (IDOT 12139)
200	Cover page of as built drawings, enlarged and with a modification by S.Gobelman
202	Updated Demonstrative prepared by S. Gobelman