

**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 3, 2016, Respondent, Illinois Department of Transportation, filed and served its "IDOT Hearing Exhibits for Admission into Evidence" with the Clerk of the Pollution Control Board, a copy of which are hereby served upon you.

Respectfully Submitted,

By:



EVAN J. MCGINLEY  
ELLEN O'LAUGHLIN  
Assistant Attorneys General  
Environmental Bureau  
69 W. Washington, 18<sup>th</sup> Floor  
Chicago, Illinois 60602  
(312) 814-3153  
[emcginley@atg.state.il.us](mailto:emcginley@atg.state.il.us)  
[eolaughlin@atg.state.il.us](mailto:eolaughlin@atg.state.il.us)  
[mccaccio@atg.state.il.us](mailto:mccaccio@atg.state.il.us)

MATTHEW J. DOUGHERTY  
Assistant Chief Counsel  
Illinois Department of Transportation  
Office of the Chief Counsel, Room 313  
2300 South Dirksen Parkway  
Springfield, Illinois 62764  
(217) 785-7524  
[Matthew.Dougherty@Illinois.gov](mailto:Matthew.Dougherty@Illinois.gov)

**CERTIFICATE OF SERVICE**

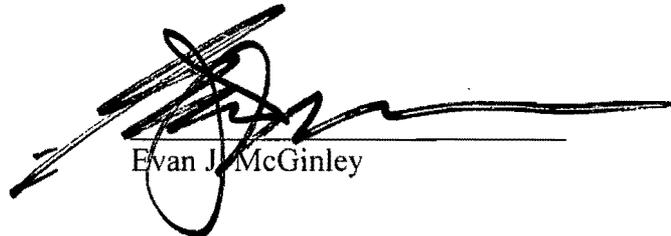
***Johns Manville v. Illinois Department of Transportation, PCB 14-3 (Citizens)***

I, EVAN J. MCGINLEY, do hereby certify that, today, June 3, 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 Hearing Exhibits for Admission into Evidence."

Bradley Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601  
[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)

John Therriault  
Clerk of the Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601  
[john.therriault@illinois.gov](mailto:john.therriault@illinois.gov)

Susan Brice  
Lauren Caisman  
Bryan Cave LLP  
161 North Clark Street, Suite 4300  
Chicago, Illinois 60601  
[Susan.Brice@bryancave.com](mailto:Susan.Brice@bryancave.com)  
[Lauren.Caisman@bryancave.com](mailto:Lauren.Caisman@bryancave.com)



Evan J. McGinley

# Electronic Filing - Received, Clerk's Office : 06/03/2016

Johns Manville v. IDOT

PCB NO. 2014-003

IDOT Hearing Exhibits for admission into Evidence (Revised 6-3-16)

No.	TD	Exhibit Description
8	008	Expert Rebuttal Report of Steven L. Gobelman with appendices dated May 29, 2015
20	020	Notice to Bidders, Specifications, Proposed Contract and Contract Bond (JM 000604-000683)
21	21A	21A: As Built IDPW Plans for Proposed Federal Aid Highway F.A. Route 437 – Section 8 – HB& i-VB Lake County (JM001132-001235)
	21B	21B: IDOT 003355-003447
22	022	Letter from S. Ziejewski to W.E. Baumann dated September 24, 1970 (IDOT 000261)
23	023	Letter from H. Bonham to S. Ziejewski dated August 19, and attachments (IDOT 00275-00284)
24	024	Letter from W. Cellini to E. Bollander dated September 30, 1971 (IDOT 000260)
25	025	Letter to R. Schmidt to S. Ziejewski dated November 15, 1971 (IDOT 000247-000249)
26	026	Schedule of Prices (IDOT 000041-000063)
27	027	Letter to R. Golterman to E. Rosenberg dated December 7, 1971 (IDOT 000247-000249)
28	028	Letter to G. Moberly to R. Schmidt dated May 25, 1972 (IDOT 000137-000139)
29	029	Supervision Engineering Report dated October 17, 1972 (IDOT 000154)
30	030	Construction Audit [undated] (IDOT 000143-000144)
32	032	Authorization for Contract Changes dated November 14, 1973 (IDOT 000318-000319)
36	036	Job Completion Notice dated February 18, 1976 (IDOT 000075)
38	038	Letter and Resolution re Joint County State Improvement Route 137 dated October 20, 1965 (IDOT 000068-000074)
39	039	Letter and Resolution re Joint County State Improvement Route 137 dated April 7, 1966 (IDOT 0000025-000032)
44	044	Highway Jurisdiction Guidelines for Highway and Street Systems dated March 2006 (IDOT 011385-011524)
51	051	Grant for Public Highway notarized April 6, 1984 (IDOT 002799-002807)
62	062	Administrative Order on Consent (JM 001248-001282)
78	078	JM Response to 104(e) Request (JM 000011-000029)
80	080	Illinois beach State Park Final Report of Findings January 20, 2006 (JM 0005884-0005939)
81	081	The Illinois Environmental Protection Act and Board regulations (historical and current)
86	086	Affidavit of Brent Tracy, notarized October 11, 2013 and attached to Complainant's Response to Respondent's Motion to Dismiss Complaint
92	092	Authorization for Contract Change dated 8/13/73 (IDOT 000315)
93	093	Request for Authorization dated 10/18/71; Document from W.E. Baumann relating to sewer Approval dated 10/28/71 (IDOT 000287-89)
94	094	Shoo Fly Road Proposal (IDOT 000223-226)
95	095	Engineer's Report dated 8/2/72 (IDOT 000171)

Electronic Filing - Received, Clerk's Office : 06/03/2016

No.	TD	Exhibit Description
102		Second Five-Year Review Report prepared by USEPA for Johns Manville (former 21)
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 21)
105		Topographical Map (Former 10A)
106		Topographical Map (Former 10B)
107		Topographical Map (Former 10C)
108		Topographical Map (Former 10D)
109		Topographical Map (Former 10E)
110		Topographical Map (Former 10F)
113		Aerial Photograph of Johns Manville Facility (former 11)
114		Environmental Protection Act (former 12)
115		State of Illinois Environmental Protection Agency Solid Waste Rules & Regulations (Former 13)
116		Complainant's Response to Respondent's Interrogatories (Former 15)
117		Complainant's Response to Respondent's Requests for Production of Documents (Former 16)
118		Complainant's Responses to Second Set of Interrogatories (Former 17)
119		Complainant's Responses to Respondent's Second Set of Requests for Production (Former 18)
120		USEPA Comments on Engineering Evaluation Cost Analysis Report Revision 1 (former 20)
123		Email: Bruce Ray to Coyle Ann re: Waukegan Additional Site No. 3; documentation on parties excluded from enforcement (Former 25)
124		Email: Janet Carlson to Brent Tracy re: Evaluation of IDOT (former 26)
125		Email: Brent Tracy to Janet Carlson re: JM 104 (e) Response (former 27)
129		AECOM Removal Action Work Plan for Southwestern Site Area, Sites 3m 4/5, and 6, Waukegan, Illinois (Former 33)
132		Southwestern Site Area, Sites 3,4/5 and 6 Removal Action Plan Scope of Work and Implementation Issues (Former 37)
133		Letter: B. Bradley (USEPA) to D. Clinton (JM) re: Approval of Work Plan (Former 38)
134		Complainant's Revised Response to Respondent's Interrogatories (former 39)
139		Photos taken of vicinity of Sites 3 & 6 by Steven Gobelman (Former 44)
140		Memo from Sigmund Ziejewski to W.E. Berman re: Special Provisions to be adjusted for "Status of Utilities" (Former 45)
141		Change Order for Special Excavation (former 47)
142		Large Maps (former 50)
143		Photos of Johns Manville Site (part of 51)
158		Photos of Johns Manville Site (part of 51)
159		Map of Site (part of 51)
160		Contract for Legal Services between IDOT and Andrews Engineering (former 52)

No.	TD	Exhibit Description	
161		Email: B. Tracey (Johns Manville) to Various Individuals cc: D. Clinton (former 55)	
162		Quitclaim Deed (former 56)	
163		Quitclaim Deed (former 57)	
164		Cross Section A-A; Cross Section B-Band Greenwood Avenue (former 58)	
165		IDOT Lake County Jurisdictional Map (former 59)	
166		Memo: B. M. Borrud to Stahl Renwick and Mason Nicholson re: Agreement executed between City of Waukegan and State of Illinois (former 60)	
167		Right of Way Notice Letter (former 61)	
200		Cover page of as built drawings, enlarged and with a modification by S.Gobelman	
202		Demonstrative prepared by S. Gobelman	
		Aerial photographs that are used by IDOT but not JM in its case in chief.	