

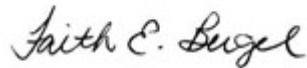
BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, PRAIRIE RIVERS)
NETWORK, and NATIONAL)
ASSOCIATION FOR THE)
ADVANCEMENT OF COLORED PEOPLE,)
)
Complainants,)
) PCB 18-11
v.) (Enforcement – Water)
)
CITY WATER, LIGHT and POWER,)
)
Respondent.)
)

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **COMPLAINANTS' RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT** and **MEMORANDUM IN SUPPORT OF COMPLAINANTS' RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,



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(312) 282-9119
FBugel@gmail.com
Attorney for Sierra Club

Dated: June 24, 2022

**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

| | | |
|---------------------------------------|---|------------------------------|
| SIERRA CLUB, PRAIRIE RIVERS |) | |
| NETWORK, and NATIONAL |) | |
| ASSOCIATION FOR THE |) | |
| ADVANCEMENT OF COLORED |) | |
| PEOPLE, |) | |
| |) | PCB 18-11 |
| Complainants, |) | (Enforcement – Water) |
| v. |) | |
| |) | |
| CITY OF SPRINGFIELD, OFFICE OF |) | |
| PUBLIC UTILITIES d/b/a |) | |
| CITY WATER, LIGHT and POWER, |) | |
| |) | |
| Respondent. |) | |

COMPLAINANTS' RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to 35 Ill. Adm. 101.516, Complainants Sierra Club, Prairies Rivers Network, and National Association for the Advancement of Colored People (collectively “Complainants”) respectfully request that the Illinois Pollution Control Board (“Board”) declare City Water, Light & Power (“CWLP”) liable for continued violation of the Illinois Environmental Protection Act (“the Act”) and its implementing regulations.

This Motion seeks summary judgment regarding liability for violations of Section 12(a) of the Act (415 ILCS 5/12(a)) and implementing regulations, Sections 620.115, 620.301(a), and 620.405(a) of the Board’s groundwater quality rules (35 Ill. Admin. Code Part 620), that stem from CWLP’s operation of the ash impoundments at the CWLP Site. In limiting this request for summary judgment to a liability finding, Complainants do not concede that any particular remedy will be sufficient to remediate the violations presented in this Motion, and Complainants reserve the right to seek an order from the Board, following a hearing on remedy, requiring

CWLP to cease and desist from allowing water pollution (pursuant to 415 ILCS 5/33), imposing civil penalties (pursuant to 415 ILCS 5/42), and ordering other appropriate remedy or relief. As grounds for this Motion, Complainants state as follows:

1. Complainants have associational standing to seek the Board's review of CWLP's compliance with the Act and its implementing regulations pursuant to Section 31(d)(1) of the Act and Article XI of the Illinois Constitution.

2. The undisputed facts demonstrate that CWLP had and continues to have control over the premises where pollutants from coal ash leached and continue to leach into the groundwater and that CWLP has not taken the necessary precautions to prevent that leaching of coal ash contamination.

3. CWLP has allowed releases of coal ash contaminants boron, sulfate, and total dissolved solids ("TDS") into groundwater from one or both surface impoundments, and those releases have resulted in concentrations of those contaminants above groundwater quality standards at groundwater monitoring wells AP-1R, AP-2, AP-2R, and AP- 3.

4. The Parties have stipulated that the groundwater in the basal sand deposit beneath the Dallman and Lakeside surface impoundments and at monitoring wells AP-1, AP-1R, AP-2, AP-2R, and AP-3 is Class I. (Stip. ¶ 1, attached as Ex. A to Memorandum of Law in Support of Complainants' Renewed Motion for Partial Summary Judgment).

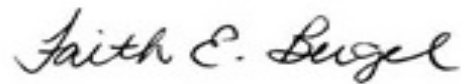
5. The undisputed facts establish CWLP's liability for violations of Section 12(a) of the Act and Sections 620.115, 620.301(a), and 620.405(a) of the Board's groundwater quality rules.

WHEREFORE, we respectfully urge the Board to:

- a) Rule that CWLP violated Section 12(a) of the Illinois Environmental Protection Act on the single count in the First Amended Complaint;
- b) Rule that CWLP violated Sections 620.115, 620.301(a), and 620.405(a) of the Board's groundwater quality rules (35 Ill. Admin. Code Part 620) and
- c) Hold a hearing to determine a remedy for the aforementioned violations, including but not necessarily limited to, an order establishing the mechanisms by which CWLP must cease and desist its violations of the Act and implementing regulations, the imposition of civil penalties, and any other relief this Board finds appropriate.

Dated: June 24, 2022

Respectfully submitted,



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Attorneys for Sierra Club, Prairie Rivers Network,
and National Association for the Advancement of
Colored People

**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

| | | |
|--|---|------------------------------|
| SIERRA CLUB, PRAIRIE RIVERS |) | |
| NETWORK, and NATIONAL |) | |
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| CITY OF SPRINGFIELD, OFFICE OF |) | |
| PUBLIC UTILITIES d/b/a |) | |
| CITY WATER, LIGHT and POWER, |) | |
| |) | |
| Respondent. |) | |
| |) | |

MEMORANDUM OF LAW IN SUPPORT OF COMPLAINANTS'
RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT

Complainants seek summary judgment on liability for violations of Section 12(a) of the Illinois Environmental Protection Act (“the Act”) and Sections 620.115, 620.301(a), and 620.405 of the Board’s groundwater quality rules, that stem from CWLP’s operation of coal ash impoundments located at its Dallman and Lakeside Power Stations (“CWLP Site”). In limiting this request for summary judgment to a liability finding, Complainants do not concede that any particular remedy will be sufficient to remediate the violations identified herein, and Complainants reserve the right to seek an order from the Board, following a hearing on remedy, requiring CWLP to cease and desist from allowing water pollution (pursuant to 415 ILCS 5/33), imposing civil penalties (pursuant to 415 ILCS 5/42), and ordering other appropriate remedy or relief.

In support of their Motion, Complainants state as follows: a) they have associational standing to seek the Board’s review of CWLP’s compliance with the Act and its

implementing regulations pursuant to Section 31(d)(1) of the Act and Article XI of the Illinois Constitution; b) the undisputed facts demonstrate CWLP had and continues to have control over the premises where pollutants from coal ash leached and continue to leach into the groundwater; c) the undisputed facts demonstrate CWLP has not taken the necessary precautions to prevent that leaching of coal ash contamination; and d) the undisputed facts show that this contamination has caused numerous exceedances of Class I Groundwater Quality Standards.

I. Statement of Facts

a. The Board's Prior Findings

The Board's June 17, 2021 Order identified undisputed facts with respect to CWLP's actions or omissions at the site.¹ Interim Op. and Order of the Board, at 24 (June 17, 2021) ("Board Order"). Specifically, the Board found there to be no genuine issue of material fact that:

1. "CWLP allowed contaminant releases from one or both surface impoundments resulting in exceedances of Class I and Class II groundwater quality standards for boron, sulfate, and [total dissolved solids ("TDS")] at some downgradient monitoring wells." Board Order at 22;
2. Boron, sulfate, and TDS were detected in CWLP's downgradient groundwater monitoring wells in concentrations exceeding Class I groundwater quality standards. Board Order at 23;
3. Groundwaters at the site are "accumulations of underground waters and therefore 'waters' of the State, all as defined in the Act." Board Order at 23;

¹ For those questions regarding which the Board did find genuine issues of material fact—specifically, whether CWLP surface impoundments caused exceedances of groundwater quality standards at monitoring well AW-3; whether exceedances of groundwater quality standards for arsenic, chromium, iron, lead, and manganese detected at downgradient monitoring wells AP-1, AP-1R, AP-2, AP-2R, AP-3, and AW-3 at concentrations less than corresponding background levels were caused by CWLP surface impoundments; and whether isolated manganese and arsenic concentrations detected reflect contaminant releases from CWLP surface impoundments—Complainants do not seek findings. Board Order at 24-27.

4. “[E]levated groundwater concentrations—at AP-1R, AP-2, AP-2R, and AP-3—were caused by ‘releases,’ as defined in the Act, from one or both surface impoundments.” Board Order at 24;
5. “CWLP ‘allowed’ these contaminant releases because it ‘exercised sufficient control over the source of the pollution.’ *Fiorini*, 143 Ill. 2d at 346. The source of the groundwater exceedances is one or both of these unlined surface impoundments.” Board Order at 25 (citing *People v. Fiorini*, 143 Ill. 2d 318, 336 (1991)); and
6. “CWLP allowed releases from one or both impoundments resulting in elevated contaminant levels at AP-1R, AP-2, AP-2R, and AP- 3.” Board Order at 26.

Table 1, below, presents a subset of groundwater monitoring exceedances identified by the Board where concentrations of coal ash contaminants exceeded background levels. Table 1 does not include results from monitoring well AW-3, results where constituents were detected at concentrations below background levels, or isolated manganese and arsenic exceedances.

| Table 1: CWLP Exceedances of Groundwater Background Values Among Class I Exceedances | | | | | |
|---|----------------------|----------------------|-------------------------|---|-------------------------------------|
| Downgradient Monitoring Well | Chemical Constituent | Sampling Date Range | Background Level (mg/L) | Range of Concentrations Exceeding Background (mg/L) | Number of Exceedances of Background |
| AP-1R | Boron | Feb 2012 – Nov 2017 | 0.787 | 3.9 – 22.5 | 23 |
| AP-1R | Sulfate | Feb 2012 – Nov 2017 | 84.5 | 436 – 672 | 23 |
| AP-1R | TDS | May 2013 – Nov 2017 | 97.94 | 1230 – 1490 | 15 |
| AP-2 | Boron | June 2010 | 0.787 | 2.63 | 1 |
| AP-2R | Boron | Feb 2012 – Nov 2017 | 0.787 | 3.16 – 10 | 23 |
| AP-2R | Sulfate | Nov 2014 – May 2016 | 84.5 | 418 – 711 | 6 |
| AP-2R | TDS | May – August 2015 | 97.94 | 1460 – 1520 | 3 |
| AP-3 | Boron | June 2010 – Nov 2017 | 0.787 | 8.03 – 29.1 | 24 |
| | | | | | Total exceedances: 118 |

Bd. Order at 14-15 (citing CWLP Resp., Group Exh. F at 00991, 008681, 008685; Am. Comp., Exh. D; CG Mot., Atts. H, J).

b. The Parties Stipulations

Between the Board's findings of no genuine issue of material fact and the issues that Complainants are no longer pursuing, the only material question remaining is the groundwater classification. Board Order at 28. The Parties have addressed this question in their stipulations.

Specifically, the May 25, 2022 Joint Stipulations provide that:

"The groundwater in the basal sand deposit beneath the Dallman and Lakeside surface impoundments is Class I" (Stip. ¶ 1, attached as Ex. A); and

"The groundwater at monitoring wells AP-1, AP-1R, AP-2, AP-2R, and AP-3 is Class I." (Ex. A, Stip. ¶ 2).

The stipulations are based on the following undisputed facts:

1. Professional Service Industries, Inc. performed slug tests for CWLP in 2010, that demonstrated that the hydraulic conductivities of the geologic material in the screened zones of monitoring wells AP-1, AP-2, and AP-3 were greater than 1×10^{-4} cm/sec standard. Bd. Order at 10–11 (citing CWLP SJ Resp., Group Ex. F at 01759-60, 01767); 35 Ill. Adm. Code 620.210(a)(4)(B)(2);
2. Monitoring wells AP-1, AP-1R, AP-2, and AP-2R, are screened within the basal sand layer at the bedrock surface. Bd. Order at 29 (citing CWLP SJ Resp., Group Ex. F at 01713);
3. Stabilize, Inc. performed a groundwater characterization for CWLP that determined that the basal sand layer at the site is the “uppermost aquifer.” Bd. Order at 10 (citing CWLP SJ Resp., Group Ex. F at 01715);
4. CWLP’s expert witness, Brad Hunsberger, testified that that the basal sand deposits beneath CWLP’s surface impoundments would be Class I groundwater; Bd. Order at 11 (citing CG Mot., Hunsberger Fact Dep. Tr. at 61); and
5. The groundwater at AP-1, AP-1R, AP-2, AP-2R, and AP-3 is at least ten feet below the land surface. Bd Order at 29.

c. Groundwater Quality Standards, CWLP Exceedances Since 2017

The Board’s June 17, 2021 Order found there to be no genuine issue of material fact that the contaminants boron, sulfate, and TDS were detected in groundwater at CWLP in concentrations exceeding Class I groundwater quality standards. Board Order at 23. Since 2017 and the groundwater monitoring results that were included in Complainants’ initial motion for summary judgment, CWLP’s self-reported groundwater monitoring results continue to show exceedances of Illinois Groundwater Quality Standards for boron, sulfate, and TDS. (2017-2022 Groundwater Monitoring Reports, attached as Ex. B.) Those exceedances are summarized in Table 2, below. Table 2 does not include exceedances at AW-3, exceedances when constituents were detected at concentrations below background levels, or isolated manganese and arsenic exceedances.

| Table 2: CWLP Exceedances of Groundwater Background (May 2018 – March 2022) | | | | |
|--|-----------------------------|--------------------------------|--|--|
| Values Among Class I Exceedances | | | | |
| Downgradient Monitoring Well | Chemical Constituent | Background Level (mg/L) | Range of Concentrations Exceeding Background (mg/L) | Number of Exceedances of Background |
| AP-1 | Boron | 0.787 | 5.03 – 22.3 | 11 |
| AP-1 | Sulfate | 84.5 | 573 – 976 | 10 |
| AP-1 | TDS | 97.94 | 1300 – 1520 | 10 |
| AP-2R | Boron | 0.787 | 2.94 – 5.62 | 11 |
| AP-2R | Sulfate | 84.5 | 467 – 816 | 10 |
| AP-2R | TDS | 97.94 | 1310 – 1860 | 9 |
| AP-3 | Boron | 0.787 | 15.8 – 20.7 | 9 |
| AP-3 | Sulfate | 84.5 | 401 – 410 | 3 |
| | | | | Total exceedances: 73 |

Ex. B, 2017–2022 Groundwater Monitoring Reports.

II. Legal Argument

There is no genuine dispute as to any material fact (i.e., CWLP allowed releases of coal ash contaminants at concentrations exceeding background concentrations and Class I groundwater standards and the groundwaters into which coal ash pollution was released are classified as Class I), and Complainants are entitled to judgment as a matter of law.² The Board's findings of undisputed facts and the Parties' stipulations regarding the classification of groundwater support partial summary judgment in Complainants' favor.

² Rather than repeating the arguments presented in their first Brief in Support of Complainants' Motion for Summary Judgment, Complainants hereby incorporate them by reference.

The Illinois Environmental Protection Act prohibits any person from causing, threatening, or allowing “the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources...” 415 ILCS 5/12(a). The Act defines, “water pollution” as:

[S] such discharge of any contaminant into any waters of the State, as will or is likely to... render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life.

415 ILCS 5/3.545. “Waters,” in turn, is defined as “all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State.” 415 ILCS 5/3.550 (emphasis added). Thus, “waters of the State” includes groundwater. *See Sierra Club v. Midwest Generation (“MWGen”),* PCB 13-15, slip op. at 77 (June 20, 2019) (citing 415 ILCS 5/3.550). In *MWGen*, the Board found that the discharge of coal ash contaminants into groundwater that caused exceedances of the Board’s groundwater quality standards (“GQSs”) constitutes water pollution in violation of Section 12(a) of the Act. *Id.* at 77.

a. CWLP caused or allowed the discharge of contaminants into the environment.

To determine whether a party has “cause[d] or threaten[ed] or allow[ed] the discharge of any contaminants” into waters of the State, Illinois courts and the Board focus on two factors: first and primarily, whether the party has the “capability of control” over the pollutants or the premises where the pollution occurred, and second, whether the party has taken “extensive precautions” to prevent pollution from occurring. *See, e.g., Gonzalez v. Pollution Control Bd.,* 2011 IL App (1st) 093021, ¶ 33; *People v. A.J. Davinroy Contractors,*

249 Ill. App. 3d 788, 794, 618 N.E.2d 1282, 1287 (1993); *Perkinson v. Ill. Pollution Control Bd.*, 187 Ill. App. 3d 689, 694-95, 543 N.E.2d 901, 904 (1989).

First, the Board has already found that CWLP had capability of control over the discharge of contaminants. Statement of Facts, *supra* at 3. When a party owns the premises where pollution occurs, Illinois courts and the Board presume that party has control over those premises. *See, e.g., People v. Inverse Investments, LLC*, PCB 11-79, 2012 WL 586821, at *10 (IPCB Feb. 16, 2012); *Meadowlark Farms, Inc. v. Ill. Pollution Control Bd.*, 17 Ill. App. 3d 851, 861, 308 N.E.2d 829, 836 (1974); *Freeman Coal Mining Corp. v. Ill. Pollution Control Bd.*, 21 Ill. App. 3d 157, 160, 313 N.E.2d 616, 619 (1974).

Second, the Board has already concluded that there is insufficient evidence in the record to support an argument that “CWLP implemented extensive precautions at the impoundments, the source of the releases....” Board Order at 25; *see, e.g., Gonzalez*, 2011 IL App (1st) 093021, ¶¶ 33-35; *Perkinson*, 187 Ill. App. 3d at 694-95. When a party is aware of a source of contamination on its property but does not remove that source, it has not taken sufficient precautions to prevent pollution. *Gonzalez*, 2011 IL App (1st) 093021, ¶ 34. Similarly, when a substance that is likely to leach is present, and the property owner fails to install liners to retain leachate or monitoring wells “built to track” contamination, the party has not taken sufficient precautions to prevent pollution and is liable under § 12(a) of the Act. *Wasteland, Inc. v. Ill. Pollution Control Bd.*, 118 Ill. App. 3d 1041, 1049, 456 N.E.2d 964, 972 (1983).

b. The contaminants discharged into the groundwater caused, and continue to cause, water pollution in Illinois.

Under § 12(a), once the Board determines that a party “[c]ause[d] or threaten[ed] or allow[ed] the discharge of any contaminants into the environment,” the Board must then

determine whether that discharge “cause[d] or tend[ed] to cause water pollution in Illinois, either alone or in combination with matter from other sources....” 415 ILCS 5/12(a). Water pollution is caused when concentrations of contaminants in groundwater exceed the Board’s GQs. *See Sierra Club v. MWGen*, slip op. at 77-85; *Int’l Union*, PCB No. 94-240, 1996 WL 454961, at *29; *Inverse Investments*, PCB 11-79, 2012 WL 586821, at *1, 9-10; *see also People v. Hicks Oil & HicksGas, Inc.*, PCB No. 10-12, 2009 WL 6506671, at *1 (IPCB Aug. 6, 2009).

The Illinois Code establishes Class I GQs that cannot be exceeded in potable resource groundwater. 35 Ill. Admin. Code § 620.410. The Illinois Class I GQs for contaminants identified in this motion are:

| Contaminant | Class I GQS (mg/L) |
|------------------------------|---------------------------|
| Boron | 2 |
| Sulfate | 400 |
| Total Dissolved Solids (TDS) | 1,200 |

See 35 Ill. Admin. Code § 620.410(a).

Here, the inquiry is not complicated. CWLP’s own monitoring conclusively demonstrates that the contaminants CWLP allowed to enter the groundwater caused, and continue to cause, concentrations of contaminants that exceed the Board’s Class I GQs. *See* Statement of Facts, *supra* at 2-5. CWLP lab results of the groundwater monitoring have identified ongoing exceedances of Illinois Class I GQs on 191 separate occasions since monitoring began in late 2010. *See* Statement of Facts, *supra* at 4, 6, Tables 1 and 2. Since contaminants were present in excess of the Board’s Class I GQs consistently over the past

twelve years, these 191 exceedances demonstrate ongoing violations of Section 12(a) of the Act.

In addition, exceedances of Section 620.410(a) standards are violations Section 620.405 which provides “No person shall cause, threaten or allow the release of any contaminant to groundwater so as to cause a groundwater quality standard set forth in this Subpart to be exceeded.”

Exceedances of Section 620.410(a) standards are also violations Section 620.301. *Sierra Club v. MWGen*, slip op. at 81 (citing 35 Ill. Admin. Code § 620.301). Section 620.301(a) provides that “No person shall cause, threaten or allow the release of any contaminant to a resource groundwater such that: 1) Treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater; or 2) An existing or potential use of such groundwater is precluded.” 35 Ill. Admin. Code § 620.301(a).

Finally, any violation of the Act is a violation of Section 620.115 which provides “No person shall cause, threaten or allow a violation of the Act, the IGPA or regulations adopted by the Board thereunder, including but not limited to this Part.” 35 Ill. Admin. Code § 620.115.

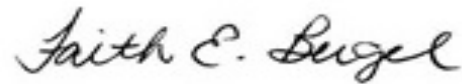
III. CONCLUSION

In sum, Respondent owns the CWLP Site and has not taken the necessary precautions to prevent water pollution at the Site. CWLP’s own monitoring results show coal ash contaminants present in the groundwater at the Site in concentrations above applicable standards—the Class I GQSs apply because the groundwater at the Site is Class I. Therefore, Respondent has caused the discharge of contaminants into the environment that has caused pollution of the waters of the State, in violation of the Act. Accordingly,

Complainants hereby request that the Board grant summary judgment on the question of Respondent's liability for violation of Section 12(a) of the Act and Sections 620.115, 620.301(a), and 620.405 of Illinois groundwater quality rules at the CWLP Site.

Dated: June 24, 2022

Respectfully submitted,

A handwritten signature in black ink that reads "Faith E. Bugel". The signature is written in a cursive, flowing style.

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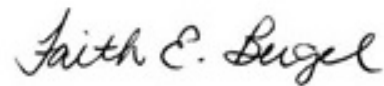
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CERTIFICATE OF SERVICE

The undersigned, Faith E. Bugel, an attorney, certifies that I have served electronically upon the Clerk and by email upon the individuals named on the attached Service List a true and correct copy of **COMPLAINANTS' RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT** and **MEMORANDUM IN SUPPORT OF COMPLAINANTS' RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT** before 5 p.m. Central Time on June 24, 2022 to the email addresses of the parties on the attached Service List. The entire filing package, including exhibits, is 574 pages.

Respectfully submitted,



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