BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

PARKER'S GAS AND MORE, INC., Petitioner,	)	
v.	)	PCB 2019-079 (LUST Appeal)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent.	)	

NOTICE

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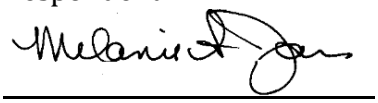
PLEASE TAKE NOTICE that I have today filed with the office of the Clerk of the Pollution Control Board **ILLINOIS EPA'S POST-HEARING BRIEF,** copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent



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Dated: December 20, 2022

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v.	)	PCB 2019-079
	)	(LUST Appeal)
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ILLINOIS EPA'S POST-HEARING BRIEF

NOW COMES the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency"), by one of its attorneys, Melanie A. Jarvis, Assistant Counsel and Special Assistant Attorney General, and hereby, submits **ILLINOIS EPA'S POST-HEARING BRIEF** to the Illinois Pollution Control Board ("Board").

I. BURDEN OF PROOF

Section 105.112(a) of the Illinois Pollution Control Board's procedural rules (35 Ill. Adm. Code 105.112(a)) provides that the **burden of proof shall be on a Petitioner**. As the Board, itself has noted, the primary focus of a reimbursement appeal must remain on the adequacy of the permit application and the information submitted by the applicant (Petitioner) to the Illinois EPA for review. See: John Sexton Contractors Company v. Illinois EPA, PCB 88-139 (February 23, 1989), p. 5. Simply, the ultimate burden of proof will remain on the party initiating an appeal (Petitioner) and what Petitioner presented for the Illinois EPA to review and render an opinion upon. See: John Sexton Contractors Company v. Illinois Pollution Control Board, 201 Ill. App. 3d 415, 425-426, 558 N.E.2d 1222, 1229 (1st Dist. 1990).

Petitioner must demonstrate to the Board that it satisfied this high burden before the Board may even entertain a review of the Illinois EPA's decision. The facts below and the

arguments presented will lead the Board to one conclusion, that Petitioner has **failed** to meet its burden of proof and a ruling affirming the Illinois EPA's decision is appropriate and warranted.

II. STANDARD OF REVIEW

Section 57.8(i) of the Environmental Protection Act ("Act") (415 ILCS 5/57.8) allows an individual to challenge a determination of the Illinois EPA to the Board pursuant to Section 40 of the Act (415 ILCS 5/40). Section 40 of the Act is the general appeal section for permits and has been used by the legislature as the basis for this type of review to the Board. When considering an Illinois EPA determination on a submitted corrective action plan and/or budget, the Board must determine whether the proposal(s), as submitted to the Illinois EPA, demonstrate compliance with the Act and Board regulations. See: Broderick Teaming Company v. Illinois EPA, PCB 00-187 (December 7, 2000).

The Board will not, and should not, consider new information not presented to the Illinois EPA. Simply put, if the information was not before the Illinois EPA that information could not have been relied upon by either the Petitioner nor Illinois EPA in review and rendering a determination on the sufficiency of the application. As such, the Illinois EPA's final decision, and the application, as submitted for review, frame the appeal. See: Todd's Service Station v. Illinois EPA, PCB 03-2 (January 22, 2004), p.4; See also: Pulitzer Community Newspapers, Inc. v. EPA, PCB 90-142 (Dec. 20, 1990). The Board must, therefore, look to the documents within the Administrative Record ("Record")[1] as the sole source of rendering an opinion on whether the Illinois EPA framed its determination consistently with the application and law. Petitioner has not challenged the sufficiency of the Record in this matter.

[1] Citations to the Administrative Record will hereinafter be made as, "A.R.___."
Citations to the Hearing Transcript will hereinafter be made as, "Trans___."

III. ISSUE

The Illinois EPA final determinations on the application frame the issues on appeal. The issue presented is whether the Petitioner can be reimbursed for $3,755.42 for actions that lack supporting documentation and exceed the minimum requirements of the Act or whether the Illinois EPA should reimburse for backfill that was acquired **free-of-charge**?

Based upon the express language of the Act and regulations thereunder, and the facts presented, the answer is **NO**.

IV. FACTS

The facts in this case are found within the Administrative Record. On August 16, 2018, the Illinois EPA received an application for payment that was dated August 13, 2018. (AR 0483). Within this application was a receipt showing that 26 loads of washout rock were received free of charge from Clinard Ready Mix. (AR 0222). This application was approved in part and denied in part on November 15, 2018. (AR 0483). Specifically, the request was made for reimbursement from the Underground Storage Tank fund for the amount of $577,244.80 and after review of the application a voucher for $572,925.56 was prepared for submission to the Comptroller's office. (AR 0483). The November 27, 2017 letter, Attachment A, stated as follows:

1. "$3,755.42, deduction for costs for Remediation and Disposal, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 3 5 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

   520.195 tons at $6.70 per ton plus 7.75% sales tax are being cut from the Backfill line item because they were provided free of charge.

2. $563.82, deduction for costs for Consultant's Materials that were not approved in a budget. The overall goal of the financial review must be to assure that costs

> associated with materials, activities, and services must be reasonable, must be consistent with the associated technical plan, must be incurred in the performance of corrective action activities, must not be used for corrective action activities in excess of those necessary to meet the minimum requirements of the Act and regulations, and must not exceed the maximum payment amounts set forth in 35 Ill. Adm. Code 734.Subpart H. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.510(b) and 35 Ill. Adm. Code 734.605(a).
>
> Pursuant to 35 Ill. Adm. Code 734.605(a), costs for which payment is sought must be approved in a budget, provided, however, that no budget must be required for early action activities conducted pursuant to 35 Ill. Adm. Code 734.Subpart B other than free product removal activities conducted more than 45 days after confirmation of the presence of free product. The costs associated with Consultant's Materials were not approved in a budget and are, therefore, ineligible for payment.
>
> In addition, the costs exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(0).
>
> Finally, the costs are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).
>
> $563.82 for grass seed is being cut." (AR 0486-0487).

This case was appealed to the Board December 21, 2018 and a hearing was held on November 15, 2022 before Hearing Officer Carol Webb.

V. PRELIMINARY MATTERS

At hearing, Petitioner presented Michael Dudas as its only witness. The Illinois EPA objected to this witness' testimony based upon two main issues with the testimony and hereby renews its objection pursuant to Supreme Court Rule 103(b). Petitioner's attorney never laid a foundation as to the witness' knowledge of the site and what had taken place with the submittal. This witness' name does not appear anywhere in the Administrative Record. (Trans. P. 29-30). In fact, the witness was hired after the cleanup was performed and is a part time employee at

Chase Environmental. (Trans. P. 28). His testimony showed that he had experience with Illinois Department of Transportation ("IDOT") jobs, but little experience with Leaking Underground Storage Tank ("LUST") clean ups. (Trans. P. 7). Most of his testimony was comparing the clean up to an IDOT job. Supreme Court Rule 401 states as follows:

> "Relevant evidence" means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.

The Illinois EPA renews its objection to the testimony of this witness on the grounds that the testimony was irrelevant, and the witness had no knowledge of the actual work on the site or the decision to ask for reimbursement from the Fund for rock it had received for **FREE**. This witness' testimony did not have a tendency to make the existence of any fact of consequence more probable or less probable than it would be by merely looking at the Administrative Record itself. Supreme Court Rule 402 states that testimony that is irrelevant is inadmissible. Further, Section 10-40 of the Administrative Procedure Act (5 ILCS 100/10-40) states that irrelevant or immaterial evidence shall be excluded and that the rules of evidence and privilege as applied in civil cases in the circuit courts of this State shall be followed.

Supreme Court Rule 602 provides as follows:

> A witness may not testify to a matter unless evidence is introduced sufficient to support a finding that the witness has personal knowledge of the matter. Evidence to prove personal knowledge may, but need not, consist of the witness' own testimony. This rule is subject to the provisions of Rule 703, relating to opinion testimony by expert witnesses.

As this testimony is from someone who cannot be an occurrence witness because he could not have personal knowledge of the matter as he was not even hired by the company at the time of the remediation and this witness was not offered as an expert witness as provided for under the Supreme Court Rules 702 and 703, the Agency requests that the Board strike this testimony.

VI. ILLINOIS EPA'S ARGUMENT

The Board is going to notice that the argument in this case is very similar to that in Piasa Motor Fuels v. Illinois EPA, PCB 2018-054, April 16, 2020, in which the Board held in favor of the Illinois EPA on this exact argument. Unfortunately, it must once again be noted that the maximum subpart H rate is just that, a maximum rate. Illinois EPA does not pay you more than what you actually spent for the item. When an item is **FREE**, expecting to be reimbursed for said item is a little excessive to say the least. The Illinois EPA paid for all expenses associated with backfilling the **FREE** material into the excavation. It only cut the cost for the **FREE** material. To save time, the Agency will quote the Board order in Piasa, which summarizes the argument to be made when a consultant gets material for **FREE**. In Piasa, the material was excavated from the same property whereas in this case, the material was obtained for **FREE**, but in both cases, the material was for no cost or otherwise, for **FREE**.

> "Based upon the time and material submission, the Agency approved reimbursement for loading of backfill from the stockpile into trucks, transportation and placement of backfill into the excavation as reasonable and incurred in performance of corrective action activities. Cross-MSJ at 11. Piasa did not explain why it excavated the backfill soil from its property, and the Agency found that "the cost requested for soil taken from another part of the owner's property for some unrelated project is unreasonable as the soil was free, and therefore it exceeded the minimum requirements of the Act." *Id*.
>
> Piasa claims that, because the Agency already approved the backfill costs in general as part of the Plan, the Agency could not now reject the reimbursement of backfill-related costs under the approved budget amount.
>
> The Agency argues that the $11,797.53 was properly denied because: (1) the Agency never approved the excavation of soil for backfill in the Plan or budget; (2) Section 734.825(b) does not address reimbursement for excavation and stockpiling of soil; (3) Subpart H rates did not apply because those activities were in excess of those necessary to meet the minimum requirements of the Act and regulations; (4) Piasa has not demonstrated that the excavation and stockpiling activities were incurred as part of the corrective action activities; and (5) the backfill material was obtained for free. Cross-MSJ at 9-11, *citing* 35 Ill. Adm. Code 734.825(b), Subpart H, *see also* John D. Warsaw v. IEPA, PCB 2018-083 (Oct. 17, 2019) (Board upheld denial of

reimbursement of cost not approved within a corrective action plan or budget). The Agency's Cross-MSJ does not reference rejection of these costs as overburden.

The Board finds that there is no issue of material fact regarding this backfill dispute. The question of what the Agency may consider in reviewing reimbursement requests may be addressed in summary judgment.

Piasa should have disclosed in its proposed Plan its intent to use backfill excavated from its property. Section 734.605(a) states that costs for which reimbursement is sought must be approved in a budget. 35 Ill. Adm. Code 734.605(a). The Plan and budget must be detailed enough to permit Agency review. Section 734.510(b) of Board regulations regarding the Agency's review of plans and budgets provides:

> The overall goal of the financial review must be to assure **that costs associated with materials, activities, and services must be reasonable**, must be consistent with the associated technical plan, **must be incurred in the performance of corrective action activities**, must not be used for corrective action activities in excess of those necessary to meet the minimum requirements of the Act and regulations, and must not exceed the maximum payment amounts set forth in Subpart H of this Part. 35 Ill. Adm. Code 734.510(b) (emphasis added).

In this case, the Agency could not determine whether costs associated with excavating backfill from Piasa's property were reasonable or incurred in the performance of corrective activities, because the Plan did not disclose to the Agency that Piasa would take these actions. Piasa cannot now claim that the Agency approved general backfill actions and is thus barred from reviewing the reasonableness of reimbursing the cost of the specific backfill actions.

Where Piasa requests reimbursement for an activity that was not approved as part of its corrective action plan, Piasa must first submit an amended corrective action plan. *See* 35 Ill. Adm. Code 734.605(a). In the context of considering an amended plan, the Agency may properly determine whether the cost of that activity is reasonable and whether that activity is in excess of those necessary to meet the minimum requirements of the Act. *See* 35 Ill. Adm. Code 734.510(b), 630(dd).

Even if Piasa can impute the Agency's general approval of the Plan to Piasa's excavation of backfill from its property, the Agency may still review those costs for reasonableness. Under Section 734.850(b), Piasa must demonstrate to the Agency that the costs for which Piasa seeks reimbursement on a time and material basis are reasonable. *See* 35 Ill. Adm. Code 734.850(b). Thus, under either circumstance, Piasa must demonstrate the reasonableness of the backfill excavation costs for which it sought reimbursement.

> Piasa did not disclose to the Agency its intent to excavate backfill from its property. The Agency did not approve a plan including the cost of excavating backfill from Piasa's property. **The Agency had the authority to determine that "the cost requested for soil taken from another part of the owner's property for some unrelated project is unreasonable as the soil was free, and therefore it exceeded the minimum requirements of the Act.**"" (Emphasis added) Piasa at 12

The Petitioner's attorney makes the same argument here as he did in Piasa. An argument that ultimately failed. Piasa is not the only case in which the Board has struck down the arguments the Petitioner proffers here. In T-Town Drive Thru Inc. v. IEPA, PCB 2007-085, the Board held as follows:

> "Subpart H sets forth "maximum" payment amounts. These amounts are not guaranteed irrespective of supporting documentation, and do not replace the requirement that a UST owner or operator provide an accounting of all costs to receive UST Fund reimbursement. In considering T-Town's reimbursement application, the Agency acted within the scope of its reviewing authority when it requested laboratory invoices from T-Town. By not providing the laboratory invoices, T-Town failed to include adequate documentation to support the claim for $8,109.02 in sampling and analysis costs."

In Friends of the Environment, NFP v. IEPA, PCB 2016-102 The Board found as follows:

> "In Illinois, when an underground storage tank (UST) containing petroleum leaks, the UST's owner can seek reimbursement from the state UST fund for certain expenses incurred while cleaning up the leak. The Illinois Environmental Protection Agency reviews requests for reimbursement from the fund and may decline to reimburse costs it deems unreasonable. When deciding whether certain costs are reasonable, the Agency must follow a set of Board-adopted procedures. **Under those procedures, the UST owner must document all costs in its reimbursement application.** (Emphasis added).
>
> Friends of the Environment, NFP (Friends) owned two USTs that leaked. After Friends removed the tanks, it applied for reimbursement from the UST fund. The Agency only approved part of the reimbursement request; it found that Friends did not document all of its cleanup costs. The Agency approved reimbursement for costs it deemed appropriately documented, and it denied reimbursement for costs that it deemed unsupported. Friends appealed the decision to the Board, arguing that it sufficiently documented its costs and that the Agency violated the Board's rules on reimbursement from the UST fund.

> Both parties moved for summary judgment. This order finds Friends did not show that the Agency violated Board rules when partially denying a reimbursement request due to lack of supporting documentation. Therefore, the Board will grant the Agency its cross-motion for summary judgment."

During the review of the reimbursement claim the Illinois EPA had questions regarding the backfill material due to the fact that no invoices were provided, just manifest tickets. The Illinois EPA sent an email to the consultant requesting the documentation to support their request. The consultant responded with manifests of the material and invoices and provided information that they were not charged for the purchase of the 520.16 tons of rock. The consultant also provided a letter from the provider that documented that there was "No charge for material." (AR 0222). The Agency then deducted $6.70 per ton which was the price on the invoices for some of the other stone backfill that was purchased for this project plus the 7.75% tax from the $24.30 subpart H rate for backfill. The Illinois EPA did reimburse for all the other costs associated with the 520.16 tons or 346.8 cubic yards to be reimbursed at the subpart H rate of $24.30 per cubic yard less the approximately $10.88 costs for the purchase of the backfill.

The Petitioner likes to argue that the Illinois EPA cut everything from the claim for reimbursement associated with this backfill and that is simply NOT true.

Illinois EPA cut $3,755.42 for the actual amount of backfill that the Petitioner received for FREE. This equates as follows:

520.16 tons x $6.70 per ton = $3,485.31 – Cost of the Backfill, if it had been paid for.

$3,485.31 x 7.75% tax = $270.11 – Tax imposed upon the Backfill, if it had been paid for.

$3,485.31 + 270.11 = $3,755.42 – Total cost of Backfill plus Tax, if it had been paid for.

To calculate the appropriate subpart H rate to be applied to transportation and placement of the material, Illinois EPA calculated the appropriate rate as follows:

520.16 tons/1.5 tons per yard = 346.8 cubic yards

$3,755.42/346.8 cubic yards = $10.88 per cubic yard

Therefore, Illinois EPA allowed $24.30 - $10.88 = $13.42 for the transportation and placement of the 520.16 tons or 346.8 cubic yards of backfill material. Illinois EPA **only** disallowed the portion of the subpart H rate that was associated with the purchase portion of this small part of the backfill and not everything associated with it as the Petitioner erroneously contends. The LUST program is a **reimbursement** program, where you are **reimbursed** for your **costs**. If you get material for **FREE**, you have no costs, therefore, you have nothing to be reimbursed for. It is a commonsense concept that the program was based upon. The Illinois EPA was acting within the Act and regulations in making these cuts.

Here, as in Piasa, Petitioner takes the position that the Illinois EPA did not have the right to review the submitted claim. What they failed to point out, as in Piasa, is that these are maximum payment amounts and in order for the Illinois EPA to approve the amounts, the Petitioner needs to submit supporting documentation. When asked for supporting documentation, what was received made clear that they were asking for reimbursement for something they had received for **FREE**. This is exactly the reason why this failsafe review by the Agency was put into the regulations.

Let us keep in mind that Chase Environmental received **FREE** backfill material. Chase Environmental did not pass the savings on to the client or the State of Illinois Leaking Underground Storage Tank Fund. And then, Chase Environmental on behalf of the Petitioner, based their argument that they should be reimbursed for something they received for **FREE** based upon a technicality they believe exists in the review process which the Board has already stated in Piasa does not exist, and for good reason apparently. This is the second case the Board has heard regarding consultants receiving **FREE** material and wanting reimbursement from the

Fund and having no shame in taking the cases to hearing as if they were entitled to reimbursement from the LUST Fund for **FREE** material as a matter of law.

VII. RESPONSE TO PETITIONER'S ARGUMENT

The Agency recognizes the hubris it takes for a consultant to request to be reimbursed for material they acquired for **FREE**. The Petitioner's own witness agreed that the material was received for **FREE**. (Trans. P. 31). In the Petitioner's Post-Hearing Brief, it also admits that the backfill material at issue was "essentially free". (Pet. Brief, P. 4). The main argument the Petitioner makes is that since the Agency did not identify any corrective action measures performed that were inconsistent with approved plan and since the costs were within the approved budget, the Agency should have approved the application of payment. Once again, the Illinois EPA points out that what is "planned" does not always end up as what was "completed or done" at a site. The Agency does not reimburse for the total "planned" costs in the Corrective Action Plan and Budget, but what is actually performed within that plan. It is ludicrous to think, which apparently the Petitioner does, that the State of Illinois through the Illinois EPA should reimburse them for actions they did not take and materials they did not purchase, even if they were approved to do so in a plan and budget. The issue here is not the corrective action measures. The main issue here is the cost of the material or in this case, the lack of a cost for the material that the Petitioner expects the State to reimburse them. The Agency did not deny the personnel costs to develop corrective action measures, the Agency denied the costs for material to perform the corrective action measures which obtained for **FREE**.

The Petitioner argues that the rock was not free, trucks need to be paid to transport and many other costs go into it, such as permits, traffic safety and special testing. As stated above in the Agency's argument, it paid for the transportation portion of the costs and the personnel time,

so the Agency is perplexed by the logic behind this argument. The Illinois EPA only cut cost for the price of the rock as determined by other information submitted by the Petitioner. The Agency took a reasonable approach by following the Act and regulations in making this decision.

The Petitioner in its brief mischaracterizes the testimony of Brian Bauer on page 10 of its brief. While Mr. Bauer did state that he would not change his decision if the rock was for $1, he went on to clarify that he would pay for the $1 rock but not at the rate paid for the material and not Subpart H rate. (Trans. P. 55.) This whole line of testimony was based upon speculation of actions not actually taken and the Agency objected to this line of questioning at the time.

The Petitioner makes the point that the conversion rate from tons to yards in the regulations does not necessarily reflect real world conditions. Unfortunately for them, the Agency is required to follow what is in the regulations. If Petitioner believes that the regulations do not reflect real world, they should put their efforts into asking for the regulations to be amended and not challenging those regulations that the Agency is bound to follow under the law in a permit appeal. The Illinois EPA is a creature of statute and as such must follow the Act and the Board's regulations thereunder.

VIII. CONCLUSION

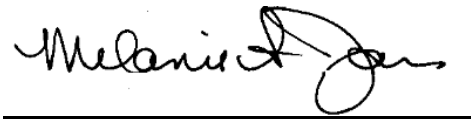
The facts and the law are clear and in favor of the Illinois EPA. The Petitioner did not justify the costs requested by submitting adequate documentation resulting in the costs being unreasonable and exceeding the minimum requirements of the Act. Requesting reimbursement for items that are received for **FREE** exceeds the minimum requirements of the Act and is de facto unreasonable. Further, the Illinois EPA asks that the Board strike Attachment A and Attachment B.

WHEREFORE: for the above noted reasons, the Illinois EPA respectfully requests the Board find in favor of the Illinois EPA in this matter and against the Petitioner.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

Respondent



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Dated: December 20, 2022

This filing submitted on recycled paper.

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on **December 20, 2022**, I served true and correct copies of **ILLINOIS EPA'S POST-HEARING BRIEF** via the Board's COOL system and email, upon the following named persons:

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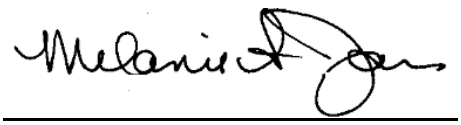
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent



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