BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Kenda C. Hess, Theresa Adams, Lori Shields, John and Joyce Borchers, Lois Rooney, Charles Archibald, Yolanda Taylor-Hudson, and Mary Ann Reifsteck, Petitioners,	)	
v.	)	PCB 2027-002 (Third-Party Pollution Control Facility Siting Appeal)
Area Disposal Service, Inc., and Village of Rantoul, Respondents.	)	

EXHIBIT
Mayor Hall Ex 7 10-19-26
exhibitsticker.com

RESPONDENT, VILLAGE OF RANTOUL'S, ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO RESPONDENT, VILLAGE OF RANTOUL

NOW COMES, Respondent, Village of Rantoul, ("Rantoul"), by and through its attorney, DAVID B. WESNER, of EVANS, FROEHLICH, BETH & CHAMLEY, Champaign, Illinois, and for its Answers to Plaintiff's First Set of Interrogatories To Village of Rantoul states as follows:

RESERVATIONS

1. Discovery and investigation are ongoing, and Rantoul reserves the right to amend and supplement its discovery responses to the full extent permitted by law and equity. Pursuant to Section 101.618 of Title 35 of the Illinois Administrative Code, Rantoul will amend any response provided herein if it learns that a response is in some material respect incomplete or incorrect. Rantoul's subsequent disclosures, via interrogatory answers, document productions, or otherwise, should be taken as a supplement to these responses even if not explicitly stated therein.

2. By responding to a discovery request, Rantoul does not admit that its response is necessarily admissible into evidence. Rantoul reserves, and has no intention of waiving, any potential argument that all or part of its responses are inadmissible as evidence for a motion or at a hearing.

INTERROGATORIES

Interrogatory No. 1: State when and describe how Rantoul first became aware that Area Disposal planned to submit an Application for approval of a recycling and/or waste transfer station.

ANSWER: On June 2, 2024, during a meeting with the Village Administrator and two Village staff members, representatives of Area Disposal indicated an intention to seek a recycling/waste transfer station in the village.

Interrogatory No. 2: State whether Trustee Terry Workman, Trustee Regina Crider, Trustee Mike Graham and Mayor Samuel Hall III, made any public or private statement, before May 19, 2026, expressing an opinion that the proposed Rantoul Transfer Station satisfied any or all of the nine criteria set forth in Section 39.2(a) of the Illinois Environmental Protection Act, 415 ILCS 5/39.2(a); and if so, for each such statement, identify the speaker, the date, the substance of the statement, the forum or medium in which it was made, and each person to whom it was made or who was present.

ANSWER: Trustee Workman, Trustee Regina Crider, Trustee Mike Graham and Mayor Samuel Hall III did not make any public or private statement before May 19, 2026 expressing an opinion as to whether the proposed Rantoul Transfer Station satisfied any or all of the nine criteria set forth in Section 39.2(a) of the Illinois Environmental Protection Act.

Interrogatory No. 3: State whether any aspect of Rantoul's budget, financial planning, or any capital project (including, but not limited to, road, infrastructure, or interchange improvements) assumed, relied upon, or was premised on revenue anticipated from the Rantoul Transfer Station or that related to Area Disposal's Application for the Rantoul Transfer Station, and if so, describe the nature of that reliance.

ANSWER: No aspect of Rantoul's budget, financial planning, or any capital project assumed, relied upon, or was premised on revenue anticipated from the Rantoul Transfer Station or that related to Area Disposal's Application for the Rantoul Transfer Station.

Interrogatory No. 4: State whether Area Disposal made any payments, donations, reimbursements, or distributed any fund to Rantoul (including but not limited to its attorney(s)), and if so, describe such payments, donations, reimbursements, or distributions including the date(s), amount(s), recipient(s), and purpose(s).

ANSWER: The only payment made by Area Disposal to the Village of Rantoul was the application fee required by Section 28-104 of the Village of Rantoul Code of Ordinances (Village Code). The recipient of the payment was the Village of Rantoul. The amount was the $50,000 application fee required by Section 28-104 of the Village Code. The payment was submitted on December 25, 2025. The purpose of the payment was to submit to the Village of Rantoul the application fee required by the Village Code to be submitted with the application for the Rantoul Transfer Station siting.

Interrogatory No. 5: Describe the process by which William Andrichik was selected and appointed to serve as Hearing Officer for the Siting Proceeding, including the identity of each person who proposed, recommended, vetted, or approved his selection, and the date(s) on which each such step occurred.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant. The only allegation in the appeal that potentially allows for consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. This interrogatory seeks information that is not relevant to that allegation.

Subject to the objections noted above, the Village states that Foth Infrastructure & Environment LLC proposed and recommended William Andrichik as Hearing Officer on January 5, 2026. On or about February 2, 2026, the Village Administrator agreed with Foth's recommendation. The Village Board formally approved his selection and appointed Mr. Andrichik as the Hearing Officer on April 17, 2026.

Interrogatory No. 6: State whether Area Disposal participated in, was consulted regarding, recommended, or was informed of the selection of the Hearing Officer prior to his appointment, and if so, describe the nature and substance of that participation or communication.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant. The only allegation in the appeal that potentially allows for consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. There is no allegation of any wrongdoing on the part of the Hearing Officer. This interrogatory seeks information that is not relevant to that allegation in the appeal.

Subject to the objections noted above, the Village states that Area Disposal did not participate in, was not consulted regarding, and did not recommend the selection of the Hearing Officer. Area Disposal was informed of the selection prior to his formal appointment for the purpose of communicating regarding the hearing, including the date, time and location of the hearing.

Interrogatory No. 7: Identify the person, entity, or fund responsible for paying the fees and costs of William Andrichik and/or Michael Best & Friedrich LLP for services rendered as Hearing Officer in the Siting Proceeding, and describe the fee arrangement, including hourly rate(s), total fees billed to date, and the source of funds used to pay those fees.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant. The only allegation in the appeal that potentially allows for consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. There is no allegation of any wrongdoing on the part of the Hearing Officer. This interrogatory seeks information that is not relevant to the allegation in the appeal. The allegations in the appeal are that the record of proceedings does not support the Village Board's decision to approve with conditions the siting application of Area Disposal and an allegation that the Mayor and Trustees prejudged the application. The fee arrangement, hourly rate and total fees billed by the Hearing Officer are irrelevant to the allegations contained in the appeal.

Subject to the objections noted above, the Village states that the Village of Rantoul was responsible for paying the fees and costs of William Andrichik for services rendered as Hearing Officer in the Siting Proceeding. The source of the funds was the application fee paid to the Village by Area Disposal, as provided in Section 28-104 of the Rantoul Village Code.

Interrogatory No. 8: Identify all meetings and oral conversations between You and Area Disposal (including but not limited to its attorney(s)) stating for each the date, participants, medium, purpose, and outcome.

ANSWER: OBJECTION. The Village objects to this interrogatory as improper and overbroad. The interrogatory does not specify the relationship between the meetings and the issues involved in the appeal. The interrogatory does not specify a time period concerning meetings and conversations and does not relate the request to the matter before the Board. The definition of "You" includes: the Village of Rantoul, its Mayor, Trustees, Village Clerk, Village Administrator, Village Director of Public Works, employees, agents, consultants, representatives and attorneys. This interrogatory would create an undue burden on the Village in attempting to obtain information

related to all elected and appointed Village officials, as well as all of its employees, agents, consultants, representatives and attorneys considering the specific allegations in the appeal. The only allegation which potentially allows consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. That allegation is limited and specific such that this interrogatory is overbroad and improper.

Subject to the objections noted above, the Village states that on May 20, 2025, the Mayor and Trustees visited the proposed site for the Rantoul Transfer Station with representatives of Area Disposal. The site visit included meetings between Area Disposal representatives and groups of two of the Mayor and Trustees to discuss the proposed transfer station.

Interrogatory No. 9: State whether Area Disposal participated in, was consulted regarding, recommended, wrote, or edited any of Rantoul's ordinances, or other rules regarding solid waste, including but not limited to Ordinance 2796 and Ordinance 2813 and, if so, describe the nature and substance of that participation or communication.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant. The allegations in the appeal concern whether the record of proceedings supports the siting application meeting the criteria in Section 39.2 of the Illinois Environmental Protection Act. The appeal does not reference or contain any allegations related to any ordinance of the Village. The only allegation which potentially allows consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. This interrogatory is not relevant to that allegation.

Interrogatory No. 10: Identify each site visit, tour, walk-through, or inspection of the proposed Rantoul Transfer Station site, or of any comparable facility, attended by any Trustee, the Mayor, or

Rantoul staff, and for each state: the date; every person present; who arranged or paid for it; and whether members of the public were notified in advance.

ANSWER: OBJECTION. The Village objects to the interrogatory as irrelevant and overly broad in requesting information about Rantoul staff. The only allegation in the appeal that potentially allows consideration of evidence outside the record concerns the allegation that the Mayor and Trustees pre-judged the application. The only relevant information would pertain to the Mayor and Trustees.

Subject to the objection noted above, see the Village's response to Interrogatory No. 8.

Interrogatory No. 11: Identify all third-party consultants, such as Foth Infrastructure & Environment, LLC, that You retained or consulted for review or evaluation the proposed Rantoul Transfer Station or any aspect of it, including but not limited to information about the Rantoul Transfer Station prior to the submission of the application, that is not part of the Siting Proceeding record.

ANSWER: None.

Interrogatory No. 12: Identify all individuals and/or entities You consulted and/or communicated with concerning whether to approve or deny the application for the Rantoul Transfer Station between December 1, 2025 and June 16, 2026 and, for each, state when such consultation(s) and/or communication(s) occurred and the participants involved.

ANSWER: OBJECTION. The Village objects to this interrogatory as vague and overly broad in that it does not specify the consultations or communications. The interrogatory seeks communications between the Village and its attorney, which are privileged attorney-client communications.

Subject to the objections noted above, the Village states that the Village did not consult or communicate with any individuals or entities beyond its attorney and the Village Administrator regarding the options for the decision on whether to approve or deny the application for the Rantoul Transfer Station.

Interrogatory No. 13: For all third-party consultants that You retained or consulted regarding the Rantoul Transfer Station, state whether Area Disposal was involved in any way in recommending, paying, or contacting them.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant. The only allegation in the appeal that potentially allows for consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. There is no allegation of any wrongdoing on the part of any third-party consultant. This interrogatory seeks information that is not relevant to the allegation in the appeal. The allegations in the appeal are that the record of proceedings does not support the Village Board's decision to approve with conditions the siting application of Area Disposal and an allegation that the Mayor and Trustees prejudged the application.

Subject to the objections noted above, the Village states that Area Disposal was not involved in any way in recommending, paying or contacting any third-party consultant retained or consulted by the Village regarding the Rantoul Transfer Station.

Interrogatory No. 14: State whether any person and/or entity, other than You, participated in developing, was consulted regarding, recommended, or suggested, any and all of the two conditions in Section 2 of Ordinance 2833 and, if so, identify the person and/or entity and describe the nature of the substance of that participation or communication.

ANSWER: None.

Interrogatory No. 15: Other than Your attorneys, identify the author(s), drafter(s), editor(s) and reviewer(s) of the Village Board's written decision approving the Rantoul Transfer Station, including Ordinance 2833, and state whether Area Disposal reviewed, commented on, or contributed to any draft or final version of that decision prior to the June 16, 2026 vote.

ANSWER: The Village Administrator reviewed the Village Board's written decision concerning the Rantoul Transfer Station shortly before the June 16, 2026 vote by the Village Board. Area Disposal did not review, comment on, or contribute to any draft or final version of the Village Board's decision.

Interrogatory No. 16: State whether, at any time between January 1, 2020 and the present, Trustee Terry Workman, Trustee Regina Crider, Trustee Mike Graham and Mayor Samuel Hall, III or their family members has or had a personal or business relationship with Area Disposal and, if so, describe the relationship.

ANSWER: At no time has Trustee Terry Workman, Trustee Regina Crider, Trustee Mike Graham or Mayor Samuel Hall, III, or their families had a personal or business relationship with Area Disposal.

Interrogatory No. 17: State whether, at any time between January 1, 2020 and the present, the Village Administrator or his family members has or had a personal or business relationship with Area Disposal and, if so, describe the relationship.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant.

The only allegation which potentially allows consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. The Village Administrator is not a member of the Village Board and did not participate in its decision nor was the Village Administrator involved in the hearing process other than coordinating logistics for the hearing. Therefore, this interrogatory concerning the Village Administrator is irrelevant.

Subject to the objection noted above, the Village states that at no time has the Village Administrator or his family had a personal or business relationship with Area Disposal.

Interrogatory No. 18: Describe the Village Administrator's role and responsibilities carried out regarding the proposed Rantoul Transfer Station.

ANSWER: OBJECTION. The Village objects to this interrogatory as irrelevant. The only allegation which potentially allows consideration of evidence outside of the record is the allegation that the Mayor and Trustees prejudged the application. The Village Administrator is not a member of the Village Board and did not participate in its decision nor was the Village Administrator involved in the hearing process other than coordinating logistics for the hearing. Therefore, this interrogatory concerning the Village Administrator's role and responsibilities is irrelevant.

Subject to the objections noted above, the Village states that the Village Administrator assisted in drafting Ordinance 2796 and Ordinance 2813. The Village Administrator secured Foth Engineering as the Village's expert and William Andrichik as the Hearing Officer regarding the application submitted by Area Disposal Inc for the proposed Rantoul Transfer Station. The Village Administrator coordinated the logistics for the hearing. The Village Administrator reviewed the proposed decision concerning Area Disposal Inc.'s application for the proposed Rantoul Transfer Station.

Interrogatory No. 19: Describe the process of receiving, making available to the Village Board of Trustees and Mayor, and including in the record, all written public comments received on or before May 18, 2026 regarding the Rantoul Transfer Station, including by stating whether, and if so on what date(s), the comments were made available to the Village Board of Trustees and Mayor.

ANSWER: Written public comments were received by the Village Clerk. The Village Clerk included all written public comment received on or before May 18, 2026 in the record of proceedings involving the Rantoul Transfer Station. The record of proceedings, which included the written public comments received on or before May 18, 2026, was made available to the Village Board of Trustees and the Mayor on June 8, 2026.

Interrogatory No. 20: State whether Area Disposal and/or GLF Environmental or their affiliates made any aspect or term of the renewal and/or extension of Your contract regarding waste and/or recycling collection services contingent upon the outcome of Area Disposal's application for the Rantoul Transfer Station.

ANSWER: The Village has not had and does not have a contract with Area Disposal regarding waste and/or recycling collection services. GFL Environmental did not and has not made any aspect or term of the renewal or extension of the Village's contract for waste collection services contingent upon the outcome of Area Disposal's application for the Rantoul Transfer Station.

Respectfully submitted,
Village of Rantoul,

BY: */s/ David B. Wesner*
David B. Wesner
Its Attorney

VERIFICATION

STATE OF ILLINOIS)
) SS
COUNTY OF CHAMPAIGN)

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true; and that as to matters where Respondent answers that it lacks sufficient knowledge to form a belief as to the veracity of an allegation, the undersigned certifies under penalty of perjury that Respondent lacks such knowledge.

Scott Eisenhauer
Village Administrator

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