BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF GLENVIEW, an Illinois municipal corporation; and SOLID WASTE AGENCY OF NORTHERN COOK COUNTY, an Illinois statutory solid waste agency;	)	
Complainants,	)	PCB CASE NO.
v.	)	
CATHOLIC BISHOP OF CHICAGO, A corporation sole; and ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, an agency of the State of Illinois;	)	
Respondents.	)	

COMPLAINT

Complainants, the Village of Glenview, an Illinois municipal corporation ("Village"), and the Solid Waste Agency of Northern Cook County, an Illinois statutory solid waste agency ("SWANCC"), by and through their attorneys, ANCEL GLINK, P.C. and complaining of the Catholic Bishop of Chicago, a Corporation Sole ("Respondent"), and the Illinois Environmental Protection Agency, an agency of the State of Illinois ("IEPA"), state as follows:

The Parties and the Pollution Control Facility at Issue

1. Respondent is the owner and operator of the Des Plaines (Sexton) Landfill pursuant to Permit Nos. 1974-24-DE and 1974-24-OP and Supplemental Permit No. 2019-356-SP (the Des Plaines (Sexton) Landfill is hereafter referred to as the "Landfill"). The Landfill is located

in unincorporated Cook County, generally north of Central Road and east of the Des Plaines River, and is adjacent and contiguous to the Village of Glenview.

2. The Village of Glenview is a community of more than 47,000 people. The corporate limits of the Village are immediately adjacent and contiguous to the Landfill.

3. The Solid Waste Agency of Northern Cook County was formed through the intergovernmental agreement of its 23 municipal members. Glenview is one of those 23 members. SWANCC provides waste disposal and recycling services for its members primarily through the operation of SWANCC's solid waste transfer station. SWANCC's transfer station is located within the Village near the Landfill. SWANCC's mission is the safe and cost-effective disposal and recycling of municipal solid waste and landscape waste for its members and their residents.

4. The Landfill has had deleterious effects on Glenview and the surrounding areas for decades and, as Respondent and IEPA are both aware, has been polluting and is continuing to pollute the groundwater. Although often promised by the Respondent, the empirical data inexorably demonstrates that the Respondent has failed to make any actual substantial corrective progress on remediation of the on-going pollution. As detailed below, the Landfill remains in violation of the Act and in violation of the Respondent's Permits, and IEPA has simply failed to fulfill its regulatory mission to hold the Respondent accountable.

5. The Respondent and IEPA have, inexplicably, now continued this malfeasance by approving a permit application authorizing construction and operation of a compost facility *on top of the already leaking Landfill* ("Compost Facility"). The Compost Facility currently under

construction is certain to exacerbate the underlying causes of the existing violations and thereby cause even greater pollution. Once again, IEPA has failed to fulfill its regulatory mission.

6. The Complainants bring this enforcement action to compel the Respondent to undertake the important steps necessary to actually remediate its polluting Landfill and, until that is accomplished, to prevent the Respondent from constructing and operating the Compost Facility. Only at such time as Respondent has remediated the causes of the on-going pollution problem can there be any confidence that the Compost Facility will not cause more pollution.

COUNT I

RESPONDENT'S FAILURE TO REMEDIATE THE ONGOING POLLUTION OF GROUND AND SURFACE WATERS IS A VIOLATION OF THE ACT AND THE RESPONDENT'S PERMITS

7. Starting in 1974, the Landfill received approval of a 65,000,000 gallon injection well field and accepted significant quantities of liquid waste for disposal. The Landfill accepted at least 3.46-million gallons of liquid waste. Liquid waste disposal in a landfill system results in the generation of large quantities of leachate (which, as the Board knows, is any liquid that has touched waste). Leachate has the potential to cause surface water and groundwater contamination and therefore must be removed from the Landfill. When the leachate head is allowed to build-up within a landfill, the pressure will cause the leachate to migrate outward through permeable soil zones around the landfill and contaminate the groundwater system.

8. Leachate head buildup is caused when a landfill accepts liquid waste, when a landfill has an insufficient final cover (soil cap) system that allows precipitation to infiltrate into the waste (at rates greater than it can be removed), by ineffective leachate removal systems (meaning low removal rates), or by some combination of the above.

9. Upon closure of the Landfill, groundwater monitoring indicated that there were three (3) groundwater contamination plumes on the north, east, and west borders of the Landfill. Thus, high leachate levels within the Landfill did in fact result in outward movement of both leachate and landfill gas, thereby polluting the groundwater.

10. In June of 1990, after the Landfill closed, the IEPA requested that the Respondent submit a Comprehensive Leachate Management Plan ("Plan"). The Plan was required to demonstrate proper management of leachate at the Landfill in order to reduce leachate levels and prevent a build-up of leachate head. Respondent did not, however, submit a Plan until 9 years later.

11. The Plan identified 5 leachate seep locations where leachate elevations exceed the ground surface elevations. The Plan also identified a significant build-up of leachate within the Landfill with a peak elevation at 688.67 ft. MSL as of May 1998. That peak elevation is approximately 48.67 ft. higher than the ground surface elevation at the approximate waste boundary (640.00 ft. MSL). The build-up of leachate and presence of leachate seeps indicates that leachate was escaping the Landfill at the time of the Plan.

12. Leachate elevations within the Landfill were measured again in September 2017. The peak leachate elevation was measured to be 676.00 ft. MSL, indicating that the high levels of leachate are still present. A comparison of the 1998 leachate elevations to the 2017 leachate elevations show an increase along the west and north portions of the Landfill. Based on this comparison, leachate was continuing to escape the Landfill and pollute the surroundings along the west and north portions of the Landfill.

13. Supplemental permit applications submitted to the IEPA by the Respondent confirmed that a release of leachate from the Landfill was occurring along the west and north portions of the property polluting surrounding groundwater and surface water.

14. More specifically, groundwater contamination was initially identified during the second quarter of 1998 in a monitoring well located in the northwest corner of the Landfill property (Well G120). Groundwater contamination was further investigated along the entire western border of the Landfill and reported to the IEPA in May 2001. Elevated levels of chloride and several other parameters were identified in multiple locations along the western border of the Landfill property and determined to be caused by the release of leachate into the shallow groundwater zone.

15. The shallow groundwater zone is separated into two (2) different depositional units, the alluvial granular unit and the glacial granular unit. The alluvial granular unit is located at an elevation above the Des Plaines River and will receive water from or discharge water to the river depending on seasonal fluctuations in the height of the river. According to the Respondent's permit file, the alluvial granular unit is hydraulically connected to both the Des Plaines River and the Landfill.

16. The glacial granular unit is located beneath the alluvial granular unit. According to the May 2001 report, the glacial granular unit likely extends laterally under and beyond the Des Plaines River to the west. The glacial granular unit is hydraulically connected to the alluvial granular unit and intermittently connected to the Des Plaines River (depending on surface water elevations in the river and depending upon the location of the glacial granular unit along the western boundary of the Landfill). According to the May 2001 report, leachate from the Landfill impacted the shallow water bearing zone (alluvial granular unit and glacial granular unit) and

likely released into the Des Plaines River through the alluvial granular unit, and also laterally under and beyond the Des Plaines River to the west through the glacial granular unit.

THE IDENTIFIED POLLUTION LEADS TO GROUNDWATER CONTAMINATION ZONES

17. As a result of the May 2001 report, the Respondent and IEPA delineated a "zone" of known groundwater contamination in the form of a Groundwater Management Zone ("GMZ") on the west Landfill boundary, and likewise delineated another GMZ on the north Landfill boundary. By establishing these GMZs, the IEPA and the Respondent agreed that Respondent would implement remedial actions to stop the pollution. Accordingly, IEPA established new groundwater monitoring thresholds against which to evaluate the effectiveness of the Respondent's remedial actions.

THE RESPONDENT'S OWN REPORTS FOR EACH GMZ DEMONSTRATE THAT THE RESPONDENT IS MAKING NO PROGRESS AND THAT THE LANDFILL CONTINUES TO POLLUTE THE SURROUNDING GROUNDWATER AND SURFACE WATER

West Groundwater Management Zone.

18. The boundaries of the GMZ along the Landfill's western border ("West GMZ") are as follows: the Landfill drainage ditch to the north, a groundwater extraction trench to the east, a location between two monitoring wells to the south, and the center of the Des Plaines River to the west. The vertical boundaries of the West GMZ are from the groundwater surface down to an elevation of 600 ft. MSL.

19. The Respondent's proposed remedial action to mitigate groundwater contamination was a groundwater extraction trench along the western border of the property. The Respondent intended that the groundwater extraction trench would contain the leachate within the legally defined limits of the Landfill and prevent leachate contaminated groundwater

migration. The groundwater extraction trench design and construction methodology were provided to the IEPA in a report submitted in October 2001. The October 2001 report states that the design "fully intersects the alluvial granular units described in the Application as contaminated."

20. Unfortunately, according to the groundwater extraction trench design drawings, boring logs, and as-built report, the groundwater extraction trench does not intercept the lower glacial granular unit, which was known to be contaminated due to a release of leachate. As constructed, the trench was never going to work.

21. The conclusion that the trench does not perform as intended is supported by the most recent Evaluation of Remedial Measures Report submitted in August 2021. According to that report, dissolved chloride concentrations in the well monitoring the glacial granular unit (R121 formerly G121) exceeded the IEPA-approved GMZ threshold beginning in 2005. Dissolved chloride concentrations have exceeded the GMZ threshold from 2005 through 2021. As of 2021, the dissolved chloride concentration was reported at 1,920,000 µg/L which is more than two times the GMZ threshold concentration (929,307 µg/L). These elevated levels of dissolved chloride indicate that leachate is still being released from the Landfill into the groundwater and that the Respondent has wholly failed to remediate the pollution from its Landfill.

22. Moreover, Respondent's IEPA Operating Permit requires the operator to submit an evaluation of the effectiveness of the groundwater extraction trench based on groundwater monitoring results over time. Ignoring the actual data, the Respondent has claimed every year since 2005 (without any supporting basis in fact) that the concentrations measured through groundwater monitoring have peaked and that the concentrations will eventually diminish with

the continued operation of the trench. But the data reported demonstrates that the trench has been ineffective in preventing leachate contaminated groundwater migration and containing leachate to the legally defined site limits. Furthermore, the leachate head has increased near Well R121 from 1998 to at least 2017, indicating that leachate migration in this area will continue to be an issue based on current operations.

23. The groundwater contamination through the glacial granular zone (and the Respondent's failure to prevent that contamination) is a violation of the following regulations:

- 415 Illinois Compiled Statutes ("ILCS") 5/12 (a);
- 415 ILCS 5/21 (d)(1);
- 415 ILCS 5/21 (d)(2);
- 415 ILCS 5/21 (o)(2);
- 415 ILCS 5/21 (o)(3);
- Title 35 IAC Section 807.313; and
- Title 35 IAC Section 807.315.

North Groundwater Management Zone

24. Groundwater contamination was also identified during the second quarter of 2001 in a monitoring well located in the northern portion of the Landfill property (Well G127). Leachate seeps and landfill gas have been occasionally encountered during detection monitoring activities at Well G127.

25. Groundwater contamination was further investigated along the Landfill's northern border and reported to the IEPA in April 2002. The presence of volatile organic compounds and high dissolved chloride concentrations were determined to be caused by Landfill gas impacts and leachate impacts. Upon further analysis of groundwater contamination in this area, it was concluded that impacts due to leachate are limited to Well G127 due to infiltration of surface

seeps. In response, the Respondent and IEPA delineated a GMZ along the northern portion of the Landfill. As with the GMZ on the western border, this GMZ for the northern border required the Respondent to implement remedial actions and the IEPA established new groundwater monitoring thresholds against which to evaluate the effectiveness of the Respondent's remedial actions.

26. The boundaries of the GMZ along the Landfill's northern border ("North GMZ") are set by four (4) monitoring wells that are used to measure the extent of groundwater contamination. The vertical boundaries of the North GMZ are from the groundwater surface down to the extents of a "weathered till" zone defined by a series of boring logs.

27. Groundwater has been documented to flow from south to north in this area, therefore, Well G127 is the upgradient well and Well G134 is the downgradient well. There is a drainage ditch located on the Landfill between Well G127 and Well G134. The drainage ditch accepts stormwater from Beck Lake (north of the Landfill property) and stormwater run-off from the Landfill and conveys it to the Des Plaines River.

28. The Respondent proposed a remedial action described as the "continued operation of the landfill gas collection system and further optimization of the gas extraction efficiency of the well field." The IEPA later requested that a leachate management system be added as another remedial action. More specifically, IEPA determined that a perimeter leachate management system consisting of leachate extraction wells and a force-main system located in the vicinity of Well G127 would help prevent leachate seeps.

29. But once again the Respondent's remedial actions have proven ineffective. Based on the most recent Evaluation of Remedial Measures Report submitted in August 2021, dissolved

chloride concentrations in Well G127 have exceeded the GMZ threshold. The elevated concentrations of dissolved chloride observed in Well G127 indicates the presence of leachate in the groundwater sample. The downgradient groundwater monitoring well, Well G134, has also exceeded the background standard for dissolved chloride from 2005 through at least the most recent report in 2021.

30. Well G127 and Well G134 have exceeded the standard for dissolved chloride since the establishment of the GMZ in 2004—and this despite the Respondent's implementation of its so-called "remedial actions." There simply are no constructed remedial measures preventing the migration of leachate between Well G127 and Well G134. However, the Landfill drainage ditch located between these two wells indicates that the surface water elevation in the drainage ditch is at a similar elevation to the groundwater measured on either side, which indicates that the shallow groundwater monitored in Well G127 and Well G134 may be hydraulically connected to the Landfill drainage ditch and consequently the Des Plaines River.

31. The continuing exceedance and increasing trend in dissolved chloride concentrations in both Well G127 and Well G134 are empirical proof that the Respondent's remedial actions are not effectively preventing a release of leachate through groundwater in this area. The release of leachate has potential to discharge into the Landfill drainage ditch and consequently the Des Plaines River. Furthermore, the leachate head has increased in the northern portion of the Landfill from 1998 to at least 2017, indicating that leachate migration in this area will continue to be an issue based on current operations.

32. The ongoing release of leachate into surface waters is a violation of the following regulations:

- 415 ILCS 5/12 (a);
- 415 ILCS 5/21 (d)(1);
- 415 ILCS 5/21 (d)(2);
- 415 ILCS 5/21 (o)(2);
- 415 ILCS 5/21 (o)(3);
- Title 35 IAC Section 807.313; and
- Title 35 IAC Section 807.315.

THE RESPONDENT'S PERSISTENT FAILURE TO CONTROL THE LEACHATE AND GAS HAS MORE RECENTLY CAUSED SLOPE FAILURES AND NEW SEEPS IN FURTHER VIOLATION OF THE ACT AND ITS PERMITS

33. A visual inspection of the Landfill from surrounding properties completed in March of 2021 discovered multiple circular slope failures and noticeable soil sloughing. Three (3) notable slope failures were located directly south of Wells G127 and G134. The slope failures had noticeable sloughing 2-feet down-slope and ranged in length from 50 to 200-feet. A fourth slope failure was located approximately 600-feet to the west of Wells G127 and G134. This slope failure had noticeable sloughing 1-foot down-slope and was approximately 200-feet in length. At the location of the fourth slope failure, there existed a circular area approximately 10-feet in diameter that, unlike its surroundings, had no snow. This area was located on the inside toe of the perimeter access road. This area, absent of snow, likely indicates a leachate seep or landfill gas release point, which is consistent with the data proving that the leachate head has increased in the northern portion of the Landfill from 1998 to at least 2017.

34. The effects of the leachate head build-up within the Landfill are displaying visible signs including the noticeable slope failures. The sustained presence of the leachate head build-up indicates that the waste is saturated, which has been demonstrated to increase the risk of slope failures in landfills. Indeed, the trigger mechanism for a majority of significant slope failures

in solid waste landfills has been linked to liquid, either by building up within the waste mass or through saturation in the foundation soils. The current condition of the Landfill poses a significant safety issue that has the potential to endanger public health, welfare, and the adjacent Cook County Forest Preserve property.

35. In July of 2021 the Respondent and the IEPA, acting through Cook County Department of Environment and Sustainability, identified and confirmed a slope failure caused by leachate buildup during an inspection of the Landfill. Inexplicably and despite clear evidence to the contrary, the IEPA nevertheless concluded that the demonstrated leachate buildup and subsequent slope failure did not compromise the Landfill's integrity.

36. Based upon all of the foregoing, Respondent has, is now, and continues to violate the following laws and regulations:

- 415 ILCS 5/12 (a) - No person shall: (a) Cause or threaten or allow 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, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.
- 415 ILCS 5/12 (d) - No person shall: (d) Deposit any contaminants upon the land in such place and manner so as to create a water pollution hazard.
- 415 ILCS 5/21 (d)(1) and (2) - No person shall: (d) Conduct any waste-storage, waste-treatment, or waste-disposal operation: (1) without a permit granted by the Agency or in violation of any conditions imposed by such permit..., (2) in violation of any regulations or standards adopted by the Board under this Act; or...
- 415 ILCS 5/21 (o)(2) and (3) - No person shall: (o) Conduct a sanitary landfill operation which is required to have a permit under subsection (d) of this Section, in a manner which results in any of the following conditions: ... (2) leachate flows entering waters of the State; (3) leachate flows exiting the landfill confines (as determined by the boundaries established for the landfill by a permit issued by the Agency);
- Title 35 Illinois Administrative Code Section 807.313 - No person shall cause or allow operation of a sanitary landfill so as to cause or threaten or allow 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, or so as to violate regulations or standards adopted by the Pollution Control Board under the Act. (see 415 ILCS 5/12 (a))

- Title 35 Illinois Administrative Code Section 807.315 - No person shall cause or allow the development or operation of a sanitary landfill unless the applicant proves to the satisfaction of the Agency that no damage or hazard will result to waters of the State because of the development and operation of the sanitary landfill.

37. The violation of the pertinent environmental statutes will continue unless and until this Board acts to hold the Respondent accountable for its persistent failures.

WHEREFORE, the Village of Glenview and the Solid Waste Agency of Northern Cook County respectfully request that this Board enter an order as follows:

1. Finding that Respondent has and continues to violate the Act;

2. Ordering the Respondent to undertake such actions, as set forth in a plan acceptable to this Board and the Complainants (as IEPA has been unwilling and unable to properly regulate the Respondent) as will cause the violations of the Act to end, including:

a. Prevent further migration of the contaminants released by the Respondent present in the groundwater at and near the Landfill;

b. Implement measures to prevent the release of any contaminant from the Landfill;

c. Eliminate any threat to the groundwater impacted by releases from the Landfill;

3. Assessing a civil penalty of Fifty Thousand Dollars ($ 50,000.00) against Respondent for each violation of the Act and Regulations, and an additional civil penalty of Ten Thousand Dollars ($ 10,000.00) per day for each day of each violation;

4. Assessing all costs against Respondent and in favor of the Complainants, including expert witness, consultant, and attorney fees; and

5. Granting such other relief as this Board deems appropriate and just.

COUNT II

THE COMPOST FACILITY WILL CAUSE EVEN GREATER POLLUTION AND WAS APPROVED IN VIOLATION OF THE ACT

1-38. Complainants incorporate and re-allege as part of this Count II paragraphs 1-37 set forth above as if fully set forth herein.

39. Despite decades of opportunity and despite the undertaking of "remedial activities" intended to decrease the leachate levels within the Landfill, a leachate mound approximately 43 feet above surrounding groundwater levels was still present as of September 2017. This leachate mound is empirical evidence that the final cover system of the Landfill and the leachate removal systems are flawed and insufficient.

40. Respondent is required to evaluate, on an annual basis, the effectiveness of remedial activities that are being conducted in order to manage leachate migration and groundwater contamination. As part of this evaluation process, Respondent is required to submit an annual report to the IEPA. For decades, these annual reports have concluded that the concentrations of Chemicals of Concern ("COC") indicative of leachate migration have consistently exceeded GMZ thresholds at multiple monitoring locations (R121 and G127). The Respondent's own reports are further empirical evidence that the Respondent has failed to actually, substantively, and adequately address the on-going pollution caused by its Landfill.

41. Worse, the Respondent's reports show the concentrations of COC constituents have steadily **increased** in certain monitoring locations over the past decade, further demonstrating that the "remedial activities" currently deployed by the Respondent at the Landfill are not effective.

42. In order to effectively remediate the ongoing groundwater and surface water contamination at the Landfill, the Respondent must reduce the leachate head and create the conditions for an inward gradient. In order to reduce the leachate head and create the conditions for an inward gradient, the Respondent needs to install a revised landfill final cover system and to undertake more aggressive leachate removal strategies such as additional leachate extraction

points and associated piping. The revised cover system and additional extraction points and piping must be installed across the Landfill and within the footprint of the proposed Compost Facility.

43. The proposed Compost Facility located on top of the existing cover system will prevent the remediation of the cover system and impede the placement of additional extraction points—thereby perpetuating an ongoing violation of the Act and the Permits.

44. Further, the IEPA-approved Compost Facility plans materially differ from the Compost Facility's approved fire prevention plan. The Compost Facility plans approved with the IEPA permit to develop and operate the Compost Facility and the IEPA permit to revise the Landfill's topography depict a staging building and a scalehouse structure. The IEPA permit application states that the staging building will be constructed before the Compost Facility will accept landscape trimming material and food scraps for composting. The IEPA approved these permits on October 25, 2019.

45. The Compost Facility's fire prevention plan approved in July 2020 shows no buildings being constructed on the Landfill. Accordingly, if constructed, the Compost Facility will either conflict with the IEPA-approved plans, the fire prevention plan, and possibly both.

46. As detailed above, the Respondent is—right now, prior to any Compost Facility—in violation of the Illinois Environmental Protection Act 415 ILCS 5/12 (a), which states:

> *"No person shall: (a) Cause or threaten or allow 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, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act."*

47. The proposed Compost Facility will prolong this violation. 415 ILCS 5/11 (a)(4) sets forth the finding of the General Assembly that: "it would be inappropriate and misleading for the

State of Illinois to issue permits to contaminant sources subject to such federal law, as well as State law, which do not contain such terms and conditions as are required by federal law, or the issuance of which is contrary to federal law."

48. IEPA should never have issued a permit for the Compost Facility and doing so is a direct violation of the Act and therefore beyond IEPA's powers.

WHEREFORE, the Village of Glenview and the Solid Waste Agency of Northern Cook County respectfully request that this Board enter an order as follows:

1. Finding that Respondent has and continues to violate the Act;

2. Finding that the permit issued for the Compost Facility was issued in violation of the Act and should therefore be declared void;

3. Voiding the permit for the Compost Facility until such time as the Landfill ceases to pollute the surrounding groundwater and surface water and the leachate problems leading to sloughing and cover failures are fixed;

4. Ordering the Respondent to undertake such actions, as set forth in a plan acceptable to this Board and the Complainants (as IEPA has been unwilling and unable to properly regulate the Respondent) as will cause the violations of the Act to end, including:

a. Prevent further migration of the contaminants released by the Respondent present in the groundwater at and near the Landfill;

b. Implement measures to prevent the release of any contaminant from the Landfill;

c. Eliminate any threat to the groundwater impacted by releases from the Landfill;

5. Assessing a civil penalty of Fifty Thousand Dollars ($ 50,000.00) against Respondent for each violation of the Act and Regulations, and an additional civil penalty of Ten Thousand Dollars ($ 10,000.00) per day for each day of each violation;

6. Assessing all costs against Respondent and in favor of the Complainants, including expert witness, consultant, and attorney fees; and

7. Granting such other relief as this Board deems appropriate and just.

Respectfully submitted,

THE VILLAGE OF GLENVIEW
THE SOLID WASTE AGENCY OF NORTHERN COOK COUNTY

One of their Attorneys

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APPEARANCE

I hereby file my appearance in this proceeding, on behalf the VILLAGE OF GLENVIEW and the SOLID WASTE AGENCY OF NORTHERN COOK COUNTY.

_____
One of their Attorneys

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NOTICE OF FILING

To: CATHOLIC BISHOP OF CHICAGO
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board (Board) a citizen's enforcement complaint on behalf of the VILLAGE OF GLENVIEW and the SOLID WASTE AGENCY OF NORTHERN COOK COUNTY, a copy of which is herewith served upon you along with this Notice of Filing. You may be required to attend a hearing on a date set by the Board.

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the Clerk's Office or an attorney. 35 Ill. Adm. Code 103.204(f).

Date: October 12, 2022

[Signature page follows]

One of their Attorneys

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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, certify that I have served the attached Enforcement Complaint, Notice of Filing and Appearance upon the following persons, at their respective addresses, by Certified Mail, Return Receipt requested, with proper postage prepaid and by placing copies of same with the U.S. Post Office at 211 S. Clark Street, Chicago, IL 60604, on October 12, 2022 before 5:00 p.m.

Catholic Bishop of Chicago
1400 S. Wolf Road
Hillside, IL 60162

Catholic Bishop of Chicago
835 N. Rush Street
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Illinois Environmental Protection Agency
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