

**Marek Kruk, Complainant, v. New Trier High School, Respondent
PCB 20-10 (Citizens Enforcement - Noise)**

**Kruk Written Interrogatories - Round 2
March 24, 2023**

Now comes, Complainant, Marek Kruk and hereby requests that Respondent respond to the following written interrogatories - Round 2.

Please see below Complainant's second round of written interrogatories/
Kruk response to NEW TRIER HIGH SCHOOL DISTRICT NO. 203'S
ANSWERS
TO MAREK KRUK'S FIRST SET OF INTERROGATORIES TO NEW
TRIER HIGH SCHOOL DISTRICT NO. 203

INTERROGATORIES

1. Please provide names of all individuals and their job titles at the district, to include the Board of Education members, who in 2018 and 2019 were made aware of the findings in the Shiner acoustics report dated 08/15/2018.

2. Please include the dates when these individuals were first notified.

3. This is a follow up to question 10 from the first set of interrogatories. See below.

The district's response does not answer question # 10. The district states that remedial efforts were made until measurements evidenced compliance. The question stands - Why were the Woodland Ave residents not warned of the excessive and harmful noise emanating from the dust collector?

10. Why were the Woodland Ave residents not warned of the excessive and harmful noise emanating from the dust collector?

ANSWER: The School District objects to this request to the extent it calls for a legal conclusion and to the extent the plaintiff requests irrelevant information not reasonably calculated to lead to admissible evidence. Subject to and without waiving these objections, the School District made remedial efforts after Mr. Kruk's complaints until noise measurements evidenced compliance with noise emissions levels, despite the fact that no violation of noise levels has been shown pursuant to Illinois regulations, and even though the School District was under no duty or obligation to notify outside parties of noise measurement results. Investigation continues.

4. This is a follow up to question 29 from the first set of interrogatories. See below.

The district has taken delivery of heavy HVAC chiller unit for the new east side addition. This unit was installed on December 20, 2022 in the building facing Woodland Ave, south of the service dock. The construction of the east side addition is still ongoing. Please provide information on ventilation and exhaust systems for this unit to include locations and where it will be vented outside. What impact is this unit projected to have on noise emissions on Woodland Ave?

29. Are there plans to install any additional noise generating equipment that will further degrade enjoyment and quality of life of residents on Woodland Ave.

ANSWER: The School District objects to this request to the extent that it is speculative and requests irrelevant information not reasonably calculated to lead to admissible evidence. Subject to and without waiving these objections, no. Investigation continues.

5. What class was scheduled in the wood shop in the summer school in 2019?

6. Please provide current operational schedule for the dust collector and roof top kitchen fan.

Thank you,

Marek Kruk

3/24/2023